

Rep #1 - Network Rail



OFFICIAL



Network Rail
1st Floor
Bristol Temple Point
Bristol
BS1 6NL

Date: 16 July 2025

TOWN AND COUNTRY PLANNING ACT 1990 (as amended)
PROPOSAL: Chipping Campden Neighbourhood Development Plan

Dear Sir/Madam,

Thank you for consulting us on the Chipping Campden Neighbourhood Development Plan. This email forms for the basis of our response.

Network Rail is a statutory undertaker responsible for maintaining and operating the country's railway infrastructure and associated estate. Network Rail owns, operates, maintains and develops the main rail network. This includes the railway tracks, stations, signalling systems, bridges, tunnels, level crossings and viaducts. The preparation of development plan policy is important in relation to the protection and enhancement of Network Rail's infrastructure.

As Network Rail is a publicly funded organisation with a regulated remit it would not be reasonable to require Network Rail to fund rail improvements necessitated by commercial development. It is therefore appropriate to require developer contributions to fund such improvements.

Chipping Campden Station

Page 44 of the NDP notes the support for a new railway station at Chipping Campden, however the Station is no longer proposed and policies to safeguard land have been removed from the Cotswold District Plan.

Level Crossings

Any development of land which would result in a material increase or significant change in the character of traffic using rail crossings should be refused unless, in consultation with Network Rail, it can either be demonstrated that the safety will not be compromised, or where safety is compromised serious mitigation measures would be incorporated to prevent any increased safety risk as a requirement of any permission.

There are a number of level crossings within the plan area that may be affected by development proposals:

1. Mare Brook Bridleway/ Telephone Public Level Crossing (OWW 95m 24cns)
2. Paxford 2 Public Footpath Level Crossing (OWW 95m 42cns)
3. Paxford 3 Public Footpath Level Crossing (OWW 95m 61cns)
4. Campden 1 Public Footpath Level Crossing(OWW 96m 34cns)
5. Campden 2 Public Footpath Level Crossing(OWW 96m 61cns)
6. Chipping Campden CCTV Level Crossing (OWW 96m 77cns)

Network Rail has a strong policy to guide and improve its management of level crossings, which aims to; reduce risk at level crossings, reduce the number and types of level crossings, ensure level crossings are fit for purpose, ensure Network Rail works with users / stakeholders and supports enforcement initiatives. Without significant consultation with Network Rail and if proved as required, approved mitigation measures, Network Rail would be extremely concerned if any future development impacts on the safety and operation of any of the level crossings listed above. The safety of the operational railway and of those crossing it is of the highest importance to Network Rail.

Level crossings can be impacted in a variety of ways by planning proposals:

- By a proposal being directly next to a level crossing
- By the cumulative effect of development added over time
- By the type of crossing involved
- By the construction of large developments (commercial and residential) where road access to and from site includes a level crossing
- By developments that might impede pedestrians ability to hear approaching trains
- By proposals that may interfere with pedestrian and vehicle users' ability to see level crossing warning signs
- By any developments for schools, colleges or nurseries where minors in numbers may be using a level crossing
- By any development or enhancement of the public rights of way

It is Network Rail's and indeed the Office of Rail Regulation's (ORR) policy to reduce risk at level crossings not to increase risk as could be the case with an increase in usage at the level crossings in question. The Office of Rail Regulators, in their policy, hold Network Rail accountable under the Management of Health and Safety at Work Regulations 1999, and that risk control should, where practicable, be achieved through the elimination of level crossings in favour of bridges or diversions.

The Council have a statutory responsibility under planning legislation to consult the statutory rail undertaker where a proposal for development is likely to result in a material increase in the rail volume or a material change in the character of traffic using a level crossing over a railway:-

- (Schedule 4 (j) of the Town & Country Planning (Development Management Procedure) Order, 2015) requires that *"...development which is likely to result in a material increase in the volume or a material change in the character of traffic using a level crossing over a railway"* (public footpath, public or private road) the Planning Authority's Highway Engineer must submit details to both the Secretary of State for Transport and Network Rail for separate approval.

We trust these comments will be useful in the preparation of the forthcoming plan documents.

Yours Sincerely,


Network Rail
Temple Point, Redcliffe Way, Bristol, BS1 6NL
www.networkrail.co.uk/property

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04 August 2025

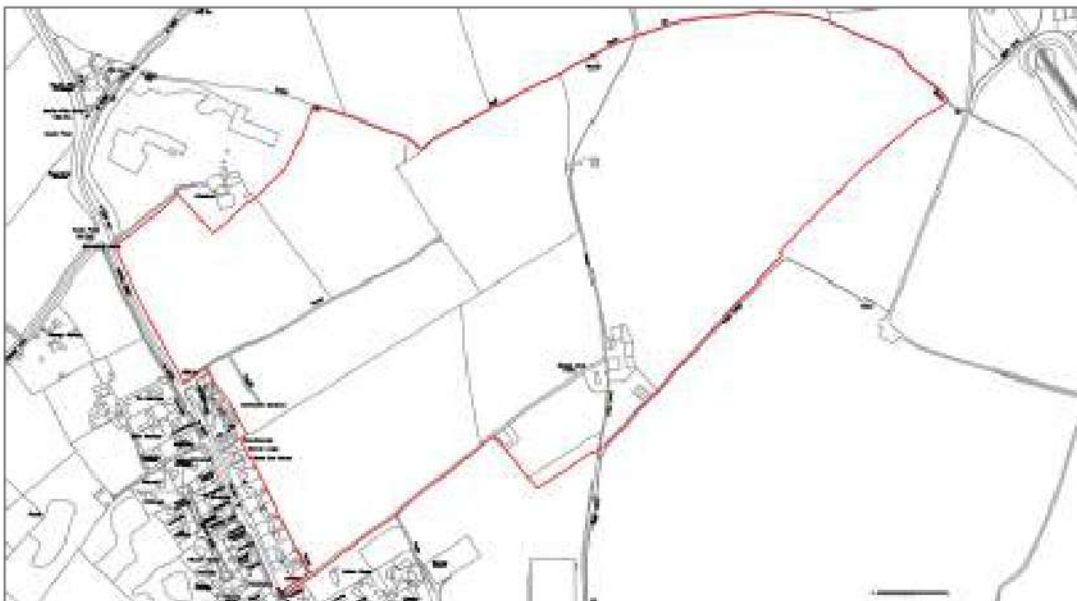
Neighbourhood Planning
Cotswold District Council
Trinity Road
Cirencester
GL7 1PX

By email: Neighbourhood.Planning@cotswold.gov.uk

Dear Sirs

**Chipping Campden Neighbourhood Plan – Regulation 16 consultation
Representation
on behalf of the landowner interests of Gloucestershire County Council only
(not its administrative functions)**

1. This representation is made to the Chipping Campden Neighbourhood Plan (NDP) consultation by SF Planning Limited on behalf of Gloucestershire County Council (GCC) in their capacity as owner of land within the NDP area only (it does not relate to GCC's administrative functions such as highways or education).
2. As confirmed in previous representations, GCC own 48.4 ha of land to the north east of Chipping Campden at Wolds End Farm, Chipping Campden GL55 6JS as shown edged red on the plan below.



3. The land falls within the Cotswolds National Landscape. It lies outside the current Development Boundary and Conservation Area but is well-related to the existing settlement pattern, forming a logical extension and rounding off to the north and west of Chipping Campden. In terms of its proximity to local services, it is considered very sustainably located.
4. We have previously submitted representations on the 2024 Regulation 14 draft neighbourhood plan in the same format as this representation. However, our response on behalf of GCC as landowner is not recorded in the February 2025 consultation report.
5. We note that there have been some small changes to some of the supporting text within the plan. The purpose of this representation is to ensure that the text is accurate and that our client's views as a landowner have been taken into account in the preparation of the plan, including the proposal that an allocation of the Wolds End site (as outlined above) would deliver significant benefits, and enable the Town Council to better control development in the area. This is especially in light of Cotswold District Council's lack of five year housing land supply. We explain more about this below.

6. Housing provision

- 6.1 Since 12 December 2024, a revised standard method for calculating housing need as meant that CDC no longer has a five-year housing land supply. Current figures suggest that the housing land supply is at approximately 1.8 years owing to the significant increase in the required number of homes per annum.
- 6.2 Chipping Campden is considered a principal settlement in the adopted CDC local plan. It is considered one of the most sustainable locations to deliver future growth.
- 6.3 This ability to accommodate growth is especially important with such an acute affordable housing need. Page 35 of the NDP goes on to recognise the lack of social housing or housing suitable for the elderly and makes a clear statement that this needs to be addressed. This is explored in more detail on page 40. However, the NDP does not then go on to include policies which would boost the supply of housing (market, social and specialist) or allocations for any housing sites. It is open for the NDP to provide additional allocations for housing even where CDC has not chosen to allocate housing in the area.
- 6.4 For reasons covered in this letter, there is also merit in Chipping Campden understanding its specific housing need figure in more detail through

discussion with CDC and seeking to allocate housing sites and include policies which support appropriately designed and located housing, proportionate to the scale of the town.

7. Allocation of the GCC site for housing

- 7.1 The allocation of GCC's site for a residential led development would contribute towards meeting the CDC housing target in a sustainable way with a proportionate addition to Chipping Campden (using those areas of the site which relate best to the settlement).
- 7.2 We note that the approach of the Town Council remains to put up "*strong opposition to new peripheral housing developments outside the Chipping Campden Development Boundary*" as outlined on page 40 of the draft NDP. However, given the lack of affordable housing within the district and CDC being some way off meeting housing requirements, it would be more appropriate to take a flexible and holistic approach.
- 7.3 We consider the NDP an excellent opportunity to control where growth in the settlement happens, given the acute need to provide more housing across the district. The allocation of the site in the NDP would have a positive impact on CDCs ability to provide enough housing in highly sustainable locations. With no allocations, there is a strong risk that more speculative applications will come through, potentially being allowed on appeal.
- 7.4 The site is ideal for housing for the following reasons;
- It is sustainably located, in close proximity to a number of local amenities.
 - Development at the site would enable Chipping Campden to grow in a well-managed way. This growth will in turn allow local businesses and services to grow too, securing their long term viability.
 - Additional affordable housing and potentially specific types of housing such as self-build or elderly housing can be provided alongside the market homes.
 - The development would have the potential to increase the housing mix within the town; the NDP document confirms that there is not a wide variety of different types of housing in the area at present.
 - It can deliver a wider development which includes a new access to the school and a school car park (see below).
 - Planning permission for housing was granted in 2020 as outlined above. Although that permission has now lapsed, it supports the credentials of the site and its suitability for housing.
- 7.5 The site can be advanced following the grant of permission to aid with

housing supply in the short to medium term, thereby helping to sustain a five-year housing land supply of deliverable sites.

8. School car park and other infrastructure and services

- 8.1 Page 42 of the NDP document states;
"It is hoped that eventually, Chipping Campden School will have a new school campus that will offer new car park and coach parking opportunities for residents and tourists out of school hours."
- 8.2 In addition, proposed policy 1 (paragraph 4) clearly supports proposals to provide extra parking at Chipping Campden School.
- 8.3 GCC continues to progress proposals for a wider scheme which includes a new access and parking for Chipping Campden school, a site for a GP surgery, and improved footpath and cycle routes. This is in the same format we would expect an allocation to come forward. Previous pre-application advice from CDC and public consultation on this wider scheme was generally favourable. It should be noted that the consultation and pre-app proposals did not include a replacement primary school, however, Page 45 of the NDP still refers to the development of a replacement primary school. It is important to make it clear that the wider scheme does not include provision of a replacement primary school.
- 8.4 As indicated previously, there are some inaccuracies relating to the description of our client's proposals. Page 61 of the NDP document states that *"the car park would be accessed by a road integrated with the 'Bratches' housing development, on land in the ownership of Gloucestershire County Council; partly on the existing access road to Wolds End Farm, which would be upgraded"*. The current proposal is for a new car park for the school to be accessed via a road integrated with the wider development, but not *'partly on the existing access road to Wolds End Farm'* which is not suitable for such an access. We strongly suggest that this error is corrected in the next iteration.

9. Please contact me should you find it helpful to discuss the information included in this submission.

Yours faithfully


SF Planning Ltd.

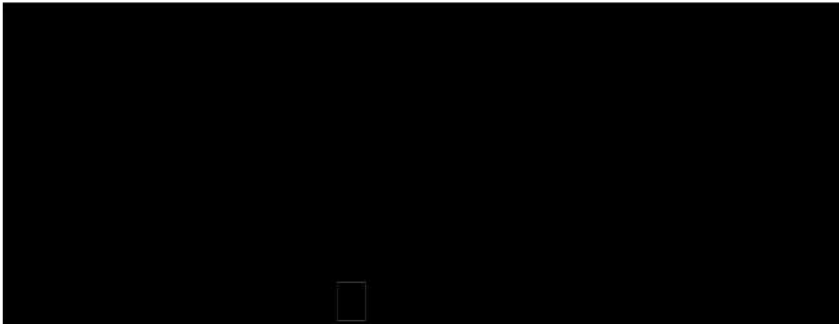
Rep #3 - Resident

How to use this form

Please complete Part A in full, in order for your representation to be taken into account at the Neighbourhood Plan examination.

Please complete Part B, identifying which paragraph your comment relates to. Repeat this for subsequent comments relating to other sections of the plan.

Part A

A large black rectangular box redacting the content of Part A. A small square checkbox is visible at the bottom center of the redacted area.

Organisation and position (if applicable):

Date: 25 July 2025

Do you wish to be notified of the Local Planning Authority's Decision to 'make' (adopt) the Plan, under Regulation 19 of the Neighbourhood Planning (General) Regulations 2012

Please delete as applicable: NO

Part B

Which part of the document does your representation relate to?

Paragraph number: "Community Aspirations", page 44-45

Policy reference:

Do you support, oppose, or wish to comment on this paragraph? (Please tick)

Support ☐ Support with modifications ☒ Oppose ☐ Have comment ☐

Please give details of your reasons for support or opposition or make comments:

Strongly support aspirations to improve infrastructure for the benefit of town residents, businesses and visitors – as set out below.

What improvements or modifications would you suggest?

I would also ask the plan to consider:

- **Town centre parking – provision of rapid electric vehicle charging infrastructure in car parks for those residents without driveways (as well as visitors).**
- **Indoor sports facility – to include provision of swimming pool, sauna and spa facilities for residents to access in line with modern provision at gyms and wellness centres.**

Please make sure any additional pages are clearly labelled



Gloucestershire Wildlife Trust
Robinswood Hill Country Park
Reservoir Road
Gloucester
GL4 6SX


www.gloucestershiREWildlifeTrust.co.uk


24/07/2025

Chipping Camden NDP response

We welcome the Chipping Campden Neighbourhood Development Plan's strong commitment to the natural environment and the thoughtful integration of biodiversity, green space protection, and landscape character throughout its policies. In particular, Policies 5 and 6 represent a significant step forward in aligning local planning with the objectives of the Gloucestershire Local Nature Recovery Strategy (LNRS) and broader ecological goals.

We offer the following comments and suggested refinements to further strengthen the Plan's delivery and resilience in a changing strategic context.

Policy 5: Biodiversity Net Gain and Local Nature Recovery

We support the clear ambition of Policy 5 in aligning with the Environment Act 2021 and in targeting BNG delivery within the parish's ecological network. To reinforce the effectiveness and deliverability of this policy, we recommend the following enhancements:

1. Introduce a Preferred Minimum BNG Above 10%

We recommend specifying a *preferred target of 15–20% BNG*, reflecting Gloucestershire's environmental ambition as outlined in Local Plan policies EN8/EN9 and the draft LNRS. This ensures greater resilience, especially in areas with a low ecological baseline.



@gloswildlife

Registered charity number: 232590
Registered in England number: 704575
VAT number: 535 6446 33

2. **Require Monitoring and Long-Term Management Commitments**
Developers should be required to commit to *15–30 year habitat management plans*, including monitoring indicators, habitat condition assessments, and long-term delivery accountability—ideally overseen by the parish, CDC, or a recognised body (e.g. Wildlife Trust, local ecologists). County wide, we often find that developers fail to initially submit such commitments. Having a policy incorporated into the NDP should help to encourage developers to consider this crucial element from the outset.
3. **Encourage Community Involvement in BNG Delivery**
We suggest encouraging or mandating opportunities for local biodiversity action groups or interested residents to participate in the design and stewardship of off-site and on-site BNG areas. Helping to encourage parish wide engagement in wildlife conservation/stewardship.
4. **Clarify the Role of Nature-Based Flood Management (NFM)**
The policy should explicitly recognise the potential of areas such as the *Cam Brook corridor* and adjacent floodplain as dual-function BNG and NFM zones—supporting reedbed creation, riparian restoration, and natural water flow regulation.
5. **Nature Recovery Sites**
We support range and number of areas designated for improvement and protection. We would like to encourage specific restoration/conservation efforts towards site that hold Wood pasture and Parkland. We would direct the parish to funding opportunities with the Dead Wood Society Project for such efforts. Additional, efforts should also be made in the development of existing orchard sites. County wide, this type of habitat has been under pressure, any effort to restore and enhance them would be welcomed by GWT.

Policy 6: Local Green Spaces

We strongly support the designation of 22 Local Green Spaces. Many of these sites offer overlapping community, heritage, and ecological benefits. To optimise their role in nature recovery, we suggest:

1. **Distinguish Between Amenity and Biodiversity LGSs**
A typology separating primarily recreational LGSs from those with high biodiversity potential would be useful in targeting ecological funding and stewarding contributions to the Local Sites Network.



2. Add Biodiversity Management Objectives for Each LGS

Linking to the above point. Where applicable, LGSs with ecological should have site-specific objectives for habitat enhancement, tree cover, or pollinator value. Like what has been done for the Nature improvement areas in Table 7.

3. Enable Community Wildlife Stewardship

Similar to the point in Policy 5 - the policy could include encouragement for community-led green space initiatives, citizen habitat monitoring, or educational use by schools and local groups. Again, to help better promote parish wide engagement and management.

Strategic Infrastructure Contingency - Railway Station

While we recognise the potential benefits of a railway station for Chipping Campden in terms of accessibility, sustainable transport, and economic development. We would also note that such infrastructure, if progressed, would likely shift the strategic development context of the town. Presently, the NDP denotes a more organic growth pattern in the coming years, the policies are as such suitable for this specified growth. However, if a rail station were to be opened it would almost certainly change the developmental hierarchy for the Parish.

Strategic 'Risks' Identified:

- Greater development pressure on greenfield sites, particularly to the east and south.
- Risk of sprawl beyond the current settlement envelope.
- Potential fragmentation of designated Local Nature Recovery Areas and key Local Green Spaces.
- Possibly given strategic allocations by CDC in line with new infrastructure connectivity.
- Undermining of current spatial assumptions throughout the NDP.

Consequently, we would suggest either a dedicated policy around the possibility of major infrastructure development or perhaps include an amendment within an existing policy. Whereby, the NDP would be immediately reviewed as to best ensure it remains robust and sustainable in light of the possible development. From our perspective it would allow for the review of Policy 5 and 6 (as well as the designated nature areas) under a new spatial context, from which they can be strengthened, altered or protected as appropriate.



Gloucestershire
Wildlife Trust

Conclusion

We commend the Parish and Steering Group for their commitment to biodiversity, local distinctiveness, and environmental stewardship. With the suggested refinements above, the Neighbourhood Plan could be even better equipped to deliver on local and countywide ecological ambitions while remaining robust in the face of future development scenarios.

We would welcome further engagement in supporting implementation or ecological monitoring, should the opportunity arise.

Regards



Planning and Green Infrastructure Lead
Gloucestershire Wildlife Trust



@gloswildlife

Registered charity number: 232590
Registered in England number: 704575
VAT number: 535 6446 33

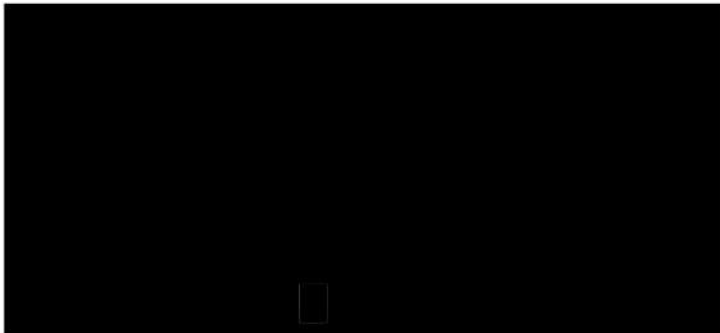
Rep #5 - Resident

How to use this form

Please complete Part A in full, in order for your representation to be taken into account at the Neighbourhood Plan examination.

Please complete Part B, identifying which paragraph your comment relates to. Repeat this for subsequent comments relating to other sections of the plan.

Part A

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Organisation and position (if applicable):

Date: 4 August 2025

Do you wish to be notified of the Local Planning Authority's Decision to 'make' (adopt) the Plan, under Regulation 19 of the Neighbourhood Planning (General) Regulations 2012

Please delete as applicable: YES / ~~NO~~

Part B

Which part of the document does your representation relate to?

Paragraph number: Sections 5 & 6 (Biodiversity and Green Spaces)

Policy reference:

Do you support, oppose, or wish to comment on this paragraph? (Please tick)

Support Tick ☐ Support with modifications ☐ Oppose ☐ **Have comment** Tick

Please give details of your reasons for **support** or opposition or make **comments**:

I am writing to provide a letter of support for your proposals to designate Local Green Spaces in Chipping Campden, with particular reference to the unique importance of maintenance, protection, and enhancement of the green space labelled in the Town Council site map as 'The Cley'. My strong support for the designation of the proposed Local Green Spaces (including The Cley) comes for the reasons outlined below:

- The trees in The Cley are visible from nearby roads and footpaths, adding beautiful, natural features that contribute to the character of the skyline of Chipping Campden and the surrounding area. The trees contribute significantly to the appearance of the area and are characteristic of an Area of Outstanding Natural Beauty (AONB), of which they are part. Furthermore, The Cley is characteristic of the 'High Wold' landscape type, which, in addition to the tranquility of the area, is one of the 'special qualities' of the Cotswolds (Cotswold District Local Plan, 2011-2031).
- The trees and greenspace in The Cley hold significant amenity value to residents, including schoolchildren who have a view of the trees and landscape on their way to school. They also have strong amenity value for members of the public, who also receive the mental and physical wellbeing benefits associated with the trees and surrounding green space of The Cley. I find the trees restorative and calming, with a peaceful background sound as the breeze rattles their leaves. I also spend many hours peacefully observing the diversity of wildlife to which these trees and greenspace are home. The Cley brings joy to the residents and visitors of Chipping Campden alike and are a key, longstanding part of the feel of this green town's community.
- The wooded areas mapped in the site labelled 'The Cley' comprise deciduous woodland - a habitat of principal importance, or Priority Habitat, under the Natural Environment and Rural Communities Act (2006) Section 41, according to maps available through DEFRA. The broadleaved trees found here are also noted as a 'special quality' of the Cotswolds AONB in its Management Plan (2018-2023).

- This country, and indeed planet, is dominated by forest loss and associated pressures on biodiversity. Land-use change from natural to anthropogenic is the leading cause of biodiversity loss globally. The trees in The Cley therefore provide a rare example of woodland expansion in a world dominated by forest loss and associated pressures on biodiversity. The trees provide habitats for: wild birds and their nests including Barn Owls, Red Kites, Sparrow Hawks and Pheasants; mammals including protected bats; reptiles and amphibians; and a rich diversity of invertebrate species (e.g. butterflies, bees, hoverflies, beetles, dragonflies, damselflies, etc., many of which are pollinators to encourage).
- The Cley has a sizeable mosaic of trees, varying in form and function, providing important habitat heterogeneity in an otherwise increasingly fragmented, urban and agricultural/grassland wider landscape. It makes an important contribution to the aims of the Biodiversity 2020 national strategy and the Natural Character Area of the Cotswolds. The woodland, associated trees, and habitats of The Cley function as 'stepping stones' for the migration and dispersal of wild species, which may be especially important given potential connectivity to the National Trust Dover's Hill woodland.
- The trees and natural land in The Cley also provide important ecosystem services. For instance, as many of Chipping Campden's residents live downhill of this area and have a high surface water flood risk, these trees will provide the important regulating service of flood management. In addition, the trees: reduce road noise; benefit human wellbeing; increase resilience to climate change (noting that Chipping Campden currently has medium climate-change vulnerability, according to MAGIC map data); and improve local water (wherein Chipping Campden falls in a Countryside Stewardship Water Quality High Priority Area, according to MAGIC map data), soil, and air quality.

In the list above, I summarise several key reasons for my support of your proposals to designate Local Green Spaces in Chipping Campden and Broad Campden, making particular reference to the area I know best. I fully appreciate the benefits of nature's contributions to people, with trees such as those on The Cley providing a soundscape rare in today's increasingly urbanised England. The strong dawn chorus, beautiful birdsong, and the flutter and buzz of a variety of insects (including valuable pollinators), and to witness birds building nests and small mammals scurrying, is a joy for all Campdonians. The Ernest Wilson Garden is a place of solace and contemplation unlike any other, with dappled light and shade, and a unique collection of species appreciated by all that visit it. The Coneygree is a stretch of green landscape offering an important, welcome view of natural land, open to walkers and providing the associated health and wellbeing benefits of this. These examples, and the Cley, are areas of natural beauty to protect for present and future generations. I cannot emphasise strongly enough my support for these plans and I cannot speak more highly of your work to protect beautiful, rare greenspaces in the town which promote such tranquility, joy, and wellbeing. Chipping Campden, and the Area of Outstanding Natural Beauty of which it is part, has a precious opportunity to conserve trees and green spaces for the benefit of people and wildlife through your proposals, which I hope will be approved.

Rep #6 - Resident

How to use this form

Please complete Part A in full, in order for your representation to be taken into account at the Neighbourhood Plan examination.

Please complete Part B, identifying which paragraph your comment relates to. Repeat this for subsequent comments relating to other sections of the plan.

Part A



Organisation and position (if applicable): District Councillor

Date: 04/08/2025

Do you wish to be notified of the Local Planning Authority's Decision to 'make' (adopt) the Plan, under Regulation 19 of the Neighbourhood Planning (General) Regulations 2012

Please delete as applicable: YES

Part B

Which part of the document does your representation relate to?

Paragraph number:

Policy reference:

Do you support, oppose, or wish to comment on this paragraph? (Please tick)

Support ☐ Support with modifications ☐ Oppose ☐ Have comment ☐

Please give details of your reasons for support or opposition or make comments:

I think it is an excellent and thorough neighbourhood plan which firstly emphasises Chipping Campden's exceptional visual characteristics through its huge treasure trove of listed buildings grouped together in a delightful bowl in the Cotswold National Landscape (AONB).

In addition in its wide ranging scope it has headlined the matters which are most important to the residents of the town and within its locality as well as the many visitors who come from both the UK and abroad. I have made my notes on these below:

What improvements or modifications would you suggest?

Please make sure any additional pages are clearly labelled

Page 40 More affordable housing is an issue across the Cotswolds and there is a strong demand for it in Chipping Campden as both house prices and rents are extremely high forcing those who were born and bred there to move away.

Page 41 parking has long been an issue in Chipping Campden and so locals from surrounding villages do not shop there as often as they would like and it also is challenging for many of the visitors to the town. Everyone would benefit from an improved parking provision and it is very much hoped that this will be provided in the existing school car park once the Aston Road development comes into being.

A re-opened railway station would be a great boost to the town and is something I would like to see.

I strongly support encouraging local retail, hospitality and other commercial premises in the town to remain providing their services rather than being permitted to change of use to residential. This will help keep the town vital. Over the years we have already lost quite a few commercial

premises in this way and currently the Kings Head is still closed with no signs as to its future - sad landmark in the centre of the town.

Page 45 a new surgery is urgently required as well as a new primary school. Both the surgery and the St James's Primary are located where there is limited parking and road access is difficult. Surgeries are also going to be expected to cover a greater range of medical needs in the future and there is just not the capacity in the current one. It also needs to be remembered that Mickleton has not had a surgery for some years and with the likely significant growth in housing there its residents will be increasing the number of patients needing care at the Campden surgery.

Leisure facilities at the school are limited due to them only being available outside school hours and in the holidays. Apart from limiting the use of the pool, gym and all weather courts this makes the provision of GP prescribed fitness training in the gym for those recovering from surgery or needing help with weight loss difficult.

Page 48 a new burial ground has been on the wish list for many years and is now increasingly urgent.

The expansion of the Chipping Campden Academy is required not only in the anticipation of the increased housing but because it is already struggling to provide the name of student places from its catchment.

Page 58 Extend the town boundary to the West – fully in support for this as it is something of an anomaly not to have the chemist which is a key shop included.

Page 143-159 – Appendix 7

All the green spaces identified in this appendix are very much valued by residents and visitors so should be preserved in perpetuity.

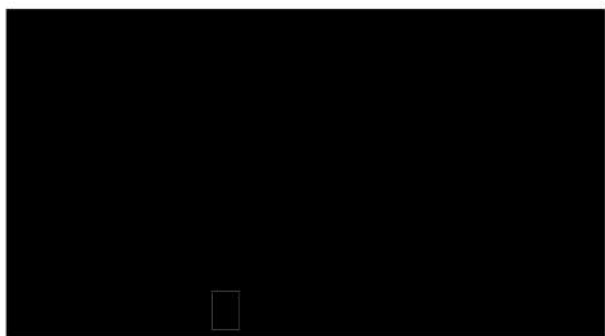
Rep #7 - Resident

How to use this form

Please complete Part A in full, in order for your representation to be taken into account at the Neighbourhood Plan examination.

Please complete Part B, identifying which paragraph your comment relates to. Repeat this for subsequent comments relating to other sections of the plan.

Part A

A large black rectangular box redacting the content of Part A. A small square checkbox is visible at the bottom left of the redacted area.

Organisation and position (if applicable):

Date:06/08/25

Do you wish to be notified of the Local Planning Authority's Decision to 'make' (adopt) the Plan, under Regulation 19 of the Neighbourhood Planning (General) Regulations 2012

Please delete as applicable: YES /

Part B

Which part of the document does your representation relate to?

Paragraph number: [Appendix 7. Local Green Spaces](#) [Pages 143 to 159](#)

Policy reference: Local Green Spaces

Do you support, oppose, or wish to comment on this paragraph? (Please tick)

Support ☒ Support with modifications ☐ Oppose ☐ Have comment ☐

Please give details of your reasons for support or opposition or make comments:

We support the retention of green spaces within the town, which are varied in character and usage. Chipping Campden sits within the fold of Cotswold escarpment and benefits from a beautiful natural backdrop of The Hoo. We support the development boundaries across the town being contained so as to ensure no loss of the green spaces proposed by the NDP. Each of these green spaces has been so designated for good reason and with the support of the Town Council.

What improvements or modifications would you suggest?

Please make sure any additional pages are clearly labelled

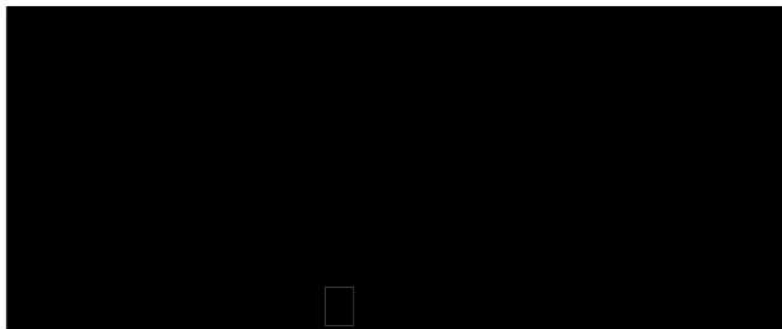
Rep #8 - Resident

How to use this form

Please complete Part A in full, in order for your representation to be taken into account at the Neighbourhood Plan examination.

Please complete Part B, identifying which paragraph your comment relates to. Repeat this for subsequent comments relating to other sections of the plan.

Part A

A large black rectangular redaction box covering the content of Part A. A small square checkbox is visible at the bottom center of the redacted area.

Organisation and position (if applicable):

Date: 08/08/2025

Do you wish to be notified of the Local Planning Authority's Decision to 'make' (adopt) the Plan, under Regulation 19 of the Neighbourhood Planning (General) Regulations 2012

Please delete as applicable: YES

Part B

Which part of the document does your representation relate to?

Paragraph number: Appendix 7 Local Green Spaces

Policy reference: Local Green Space 21 The Cley

Do you support, oppose, or wish to comment on this paragraph? (Please tick)

Support ☒ Support with modifications ☐ Oppose ☐ Have comment ☐

Please give details of your reasons for support or opposition or make comments:

Dear Sirs

We strongly support the proposed Green Space allocation of the land to the west of Grevel Lane known as the Cley. We are deeply concerned that such Green Space Allocation should be preserved and potentially improved in an area of outstanding natural beauty. There is currently a tree preservation order on the trees on the land and we are naturally keen to conserve the wildlife and tranquillity of the plot which as a community, we hold very dear for the following reasons:-

- The Cley responds positively to the listed objectives of Policy 5: Environment and Biodiversity Net Gain, namely “to provide and/or maintain green corridors for wildlife” providing as it does, an important link within the green corridor from Aston Road to Hoo Lane which also provides the opportunity for further improvement of the existing habitat.
- As we are all aware flooding is becoming an increasingly common event and mature trees provide a natural protection against storm water run-off, delaying the time of entry of the storm water into the system and thereby protecting the storm water system both in the immediate vicinity of Grevel Lane as well as the main supporting system further down the line in the town centre which we know is already vulnerable, witness the storm event of summer 2007.
- This field and the mature trees within it represents one of the last surviving areas of natural woodland in Chipping Campden providing an important habitat for local wildlife, such as the Green Woodpecker and the Great Spotted Woodpecker both of which are welcome colourful visitors to local gardens and which nest annually in the woodland along with numerous other species of importance such as barn owls, hares, rabbits, moles, field mice, muntjac deer, roe deer, foxes, badgers and a wide variety of birds, some of them rare species. It serves as a vital safe haven for protected species such as Pipistrellus (common pipistrelle bat). Clearly the destruction of the natural woodland would remove the diverse habitat required to sustain the local wildlife and will leave us all the poorer for its loss.
- The land is within an Area of Outstanding Natural Beauty and is not allocated for development. The trees are important to the local environment being visually prominent from Grevel Lane, the Aston Road and Chipping Campden in general.
- In this era of environmental awareness, climate change and the UK's drive for carbon neutrality we should not be cutting down mature trees and thereby obliterating the benefits of a limited natural resource which will be lost forever!

Therefore, we reiterate our strong support for the inclusion of The Cley within the Green Space Allocation in the Neighbourhood Development Plan currently being drawn up.

Yours faithfully

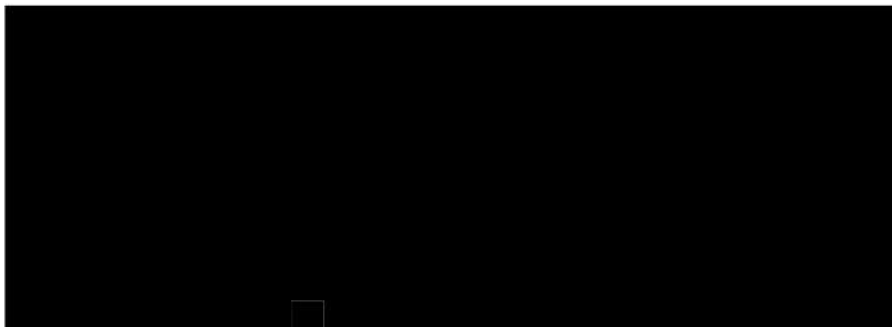


What improvements or modifications would you suggest?

Please make sure any additional pages are clearly labelled

Rep #9 - Resident

Part A



Organisation and position (if applicable):

Date: 7.8.25

Do you wish to be notified of the Local Planning Authority's Decision to 'make' (adopt) the Plan, under Regulation 19 of the Neighbourhood Planning (General) Regulations 2012

Please delete as applicable: YES

Part B

Which part of the document does your representation relate to?

Paragraph number: Section 6, Appendix 7 : The Cley

Policy reference: Planning Policies:Policy 6 Local Green Spaces

Do you support, oppose, or wish to comment on this paragraph? (Please tick)

Support ☒ Support with modifications ☐ Oppose ☐ Have comment ☐

Please give details of your reasons for support or opposition or make comments:

We are regular users of the public footpath on the north boundary of The Cley and see and enjoy the variety of wildlife present in that area. We strongly support the proposal to keep this biodiverse space as a Local Green Space in order to protect and maintain the vital woodland habitat the Cley provides. We notice that the newly installed hard fencing alongside the path has already had an impact on the ability of the general public to enjoy the path and its views and presumably on the movement of the wildlife in the area.

What improvements or modifications would you suggest?

Please make sure any additional pages are clearly labelled

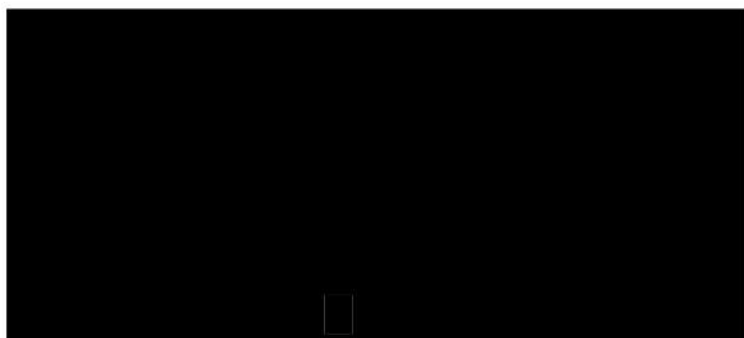
Rep #10 - Resident

How to use this form

Please complete Part A in full, in order for your representation to be taken into account at the Neighbourhood Plan examination.

Please complete Part B, identifying which paragraph your comment relates to. Repeat this for subsequent comments relating to other sections of the plan.

Part A

A large black rectangular box redacting the content of Part A. A small square box is visible at the bottom center of the redacted area.

Organisation and position (if applicable): N/A

Date: 6/7/25

Do you wish to be notified of the Local Planning Authority's Decision to 'make' (adopt) the Plan, under Regulation 19 of the Neighbourhood Planning (General) Regulations 2012

Please delete as applicable: YES

Part B

Which part of the document does your representation relate to?

Paragraph number: Pages number 50 and 143-159

Policy reference:

Do you support, oppose, or wish to comment on this paragraph? (Please tick)

Support ☒ Support with modifications ☐ Oppose ☐ Have comment ☐

Please give details of your reasons for support or opposition or make comments:

We support the development boundary as drawn. We also support the designation of local green spaces as drawn which form a key part of the natural setting of the town. The Hoo behind our house and butting on to the central conservation area the other side of the road in Back Ends is rising land and forms an integral part of this setting in our view

What improvements or modifications would you suggest?

Please make sure any additional pages are clearly labelled



To: Neighbourhood Planning,
Cotswold District Council,
Trinity Road,
Cirencester, GL7 1PX

6th August 2025

Dear Sir/Madam,

Chipping Campden Parish Neighbourhood Development Plan – Green Spaces

I write in support of the Chipping Campden Neighbourhood Development Plan (Regulation 15 Submission document (version 4th March 2025)), particularly its allocation of Local Green Spaces as set out in Policy 6.

 I welcome the fact that The Clay is identified in Schedule 7 of the Plan and is to be a designated Green Space in the Neighbourhood Plan. I am writing to support in the strongest possible terms the designation of The Clay as a Green Space.

The Clay, situated entirely within the Chilterns AONB, makes a hugely positive contribution to the setting of the town of Chipping Campden and we need to preserve it for future generations. The Clay is now one of the last surviving pieces of wild woodland in Chipping Campden and, occupying an elevated position adjacent to footpaths, is visually prominent, not only to Grevel Lane but also to the Aston Road, multiple public footpaths and across the town.

The Clay is a haven of biodiversity and wildlife, and the land, soil and trees provide a valuable "carbon sink" for the area. The ecology of the site is settled and long-established over centuries, creating highly complex and varied habitats for a wide range of plants, trees and wildlife.

In 2020, the whole of the site was granted a blanket Tree Protection Order in recognition of its arboricultural significance.

This unique site thoroughly warrants its designation as a Green Space given its historical significance, its importance to the character and appearance of the town and its vital role as a haven for wildlife and biodiversity.

Yours sincerely,





COTSWOLD
District Council

www.cotswold.gov.uk

Chipping Campden Neighbourhood Development Plan: pre-examination consultation

Regulation 16 Consultation

Neighbourhood Planning Regulations 2012

Chipping Campden Town Council has submitted a Neighbourhood Development Plan. The Plan sets out a vision for the parish of Chipping Campden, covering both the town and Broad Campden and presents planning policies which they propose be used to determine planning applications locally.

The Neighbourhood Plan and supporting documents are available to view on our website.

All comments must be received by 12 noon on **15th August 2025**. There are a number of ways to make your comments:

Complete an [electronic response form](#)

Complete **this word version** below and email it to: neighbourhood.planning@cotswold.gov.uk

Print the form and post it to: Neighbourhood Planning, Cotswold District Council, Trinity Road, Cirencester, GL7 1PX.

We will accept other comments in writing (including electronic, such as e-mail, provided that a name and address is supplied. We cannot accept anonymous comments.

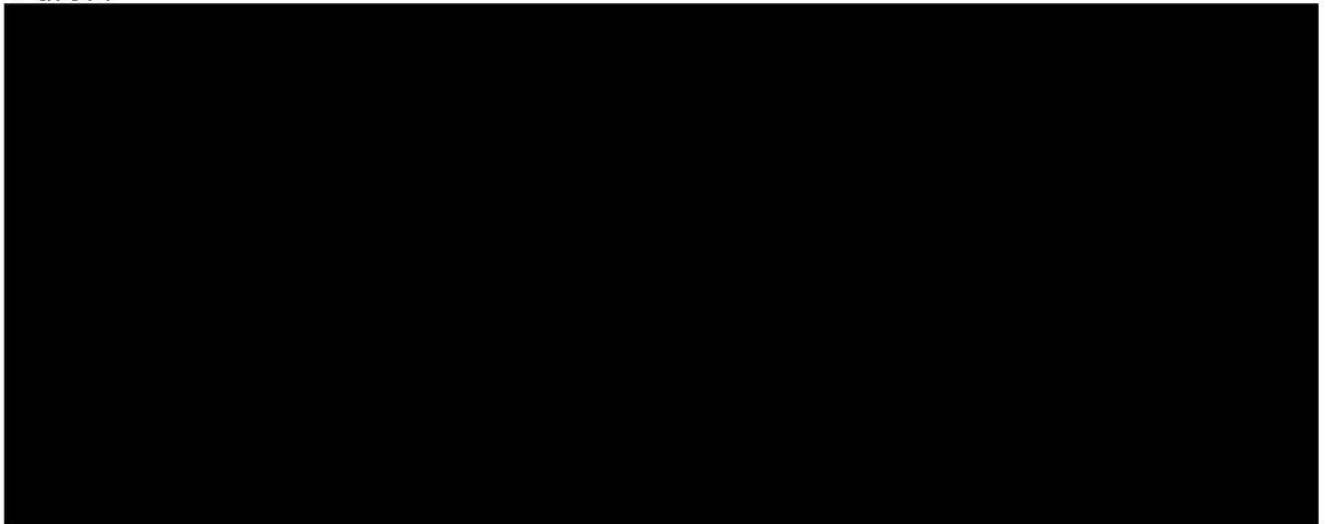
All representations will be publicly available, and identifiable by name and (where applicable) organisation. Please note that your comments, name and address and, if applicable, organisation will be publicly available but your signature, email address and telephone number will be removed. Other personal information provided will be processed by Cotswold District Council in line with Data Protection legislation. To find out how we use your personal data, please view our [privacy notice](#). Representations may include a request to be notified of the local planning authority's decision to make the plan under Regulation 19.

How to use this form

Please complete Part A in full, in order for your representation to be taken into account at the Neighbourhood Plan examination.

Please complete Part B, identifying which paragraph your comment relates to. Repeat this for subsequent comments relating to other sections of the plan.

Part A



Do you wish to be notified of the Local Planning Authority's Decision to 'make' (adopt) the Plan, under Regulation 19 of the Neighbourhood Planning (General) Regulations 2012

Please delete as applicable: YES / NO

Part B

Which part of the document does your representation relate to?

Submission 4th March.

Regulation 15.

Paragraph number:

Section 6. Appendix 1.

Policy reference:

Local Green Space 21. The Clay.

Do you support, oppose, or wish to comment on this paragraph?

(Please tick)

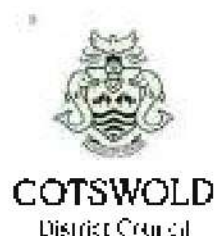
Support ☒ Support with modifications ☐ Oppose ☐ Have comment ☐

Please give details of your reasons for support or opposition or make comments:

The Clay is an area of natural outstanding beauty, home to a great deal of local life. Once green spaces have gone, they are gone forever. What will ~~be~~ we be leaving the next generation?

What improvements or modifications would you suggest?

Please make sure any additional pages are clearly labelled



Chipping Campden Neighbourhood Development Plan: pre-examination consultation

Regulation 16 Consultation

Neighbourhood Planning Regulations 2012

Chipping Campden Town Council has submitted a Neighbourhood Development Plan. The Plan sets out a vision for the parish of Chipping Campden, covering both the town and Broad Campden and presents planning policies which they propose be used to determine planning applications locally.

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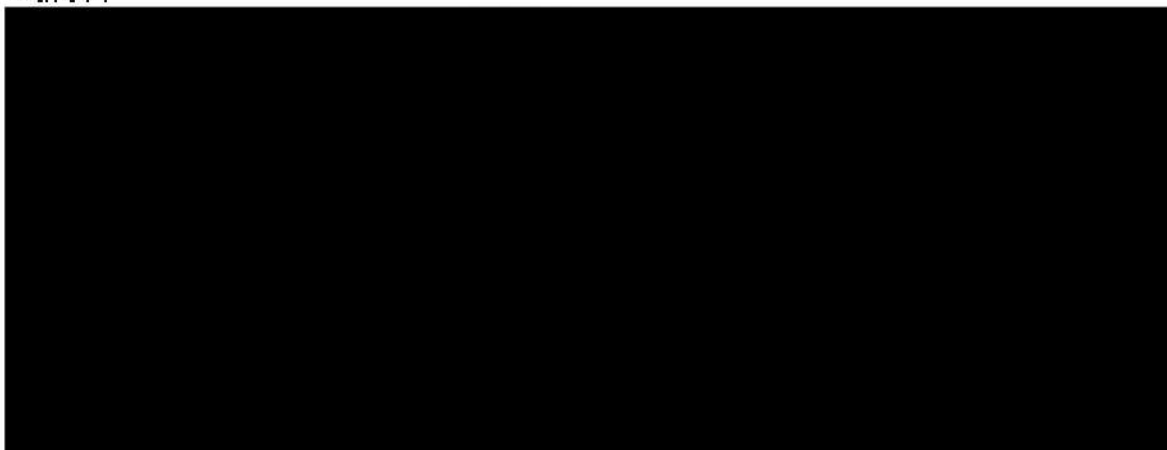
All representations will be publicly available, and identifiable by name and (where applicable) organisation. Please note that your comments, name and address and, if applicable, organisation will be publicly available but your signature, email address and telephone number will be removed. Other personal information provided will be processed by Cotswold District Council in line with Data Protection legislation. To find out how we use your personal data, please view our [privacy notice](#). Representations may include a request to be notified of the local planning authority's decision to make the plan under Regulation 19.

How to use this form

Please complete Part A in full, in order for your representation to be taken into account at the Neighbourhood Plan examination.

Please complete Part B, identifying which paragraph your comment relates to. Repeat this for subsequent comments relating to other sections of the plan.

Part A



Date: 10 August 2025

Do you wish to be notified of the Local Planning Authority's Decision to 'make' (adopt) the Plan, under Regulation 19 of the Neighbourhood Planning (General) Regulations 2012

Please delete as applicable: YES / ~~NO~~

Part B

Which part of the document does your representation relate to?

Paragraph number:

Policy reference: Policy 6

Do you support, oppose, or wish to comment on this paragraph? (Please tick)

Support ☒ Support with modifications ☐ Oppose ☐ Have comment ☐

Please give details of your reasons for support or opposition or make comments:

The areas 19, 20, 21, 15.
These areas are under constant threat for
development. These people are only concerned with
making themselves richer.

What improvements or modifications would you suggest?

Please ensure that the District Council
protects these precious areas. They support
wild life & sheep pastures.

Please make sure any additional pages are clearly labelled

They are already (21) especially being abused, to
the detriment of the living adjacent.



COTSWOLD
District Council

www.cotswold.gov.uk

Chipping Campden Neighbourhood Development Plan: pre-examination consultation

Regulation 16 Consultation

Neighbourhood Planning Regulations 2012

Chipping Campden Town Council has submitted a Neighbourhood Development Plan. The Plan sets out a vision for the parish of Chipping Campden, covering both the town and Broad Campden and presents planning policies which they propose be used to determine planning applications locally.

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All comments must be received by 12 noon on **15th August 2025**. There are a number of ways to make your comments:

Complete an [electronic response form](#)

Complete **this word version** below and email it to: neighbourhood.planning@cotswold.gov.uk

Print the form and post it to: Neighbourhood Planning, Cotswold District Council, Trinity Road, Cirencester, GL7 1PX

We will accept other comments in writing (including electronic, such as e-mail, provided that a name and address is supplied. We cannot accept anonymous comments.

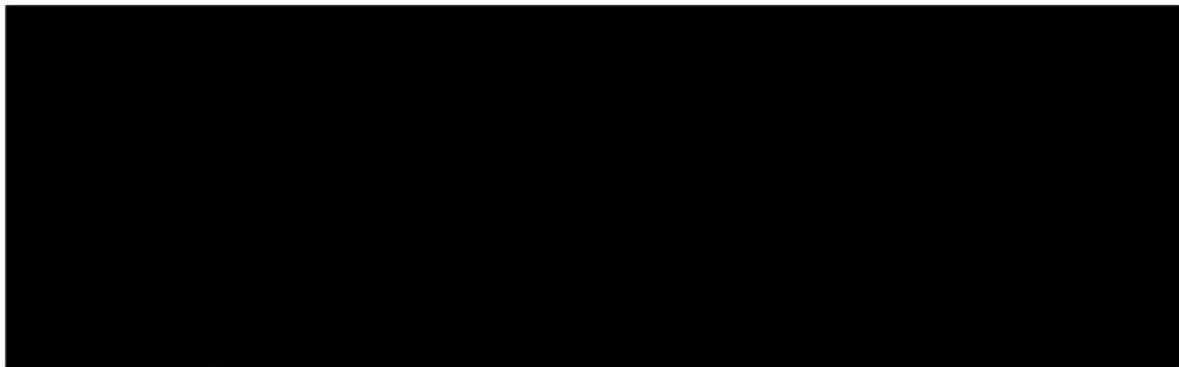
All representations will be publicly available, and identifiable by name and (where applicable) organisation. Please note that your comments, name and address and, if applicable, organisation will be publicly available but your signature, email address and telephone number will be removed. Other personal information provided will be processed by Cotswold District Council in line with Data Protection legislation. To find out how we use your personal data, please view our [privacy notice](#). Representations may include a request to be notified of the local planning authority's decision to make the plan under Regulation 19.

How to use this form

Please complete Part A in full, in order for your representation to be taken into account at the Neighbourhood Plan examination.

Please complete Part B, identifying which paragraph your comment relates to. Repeat this for subsequent comments relating to other sections of the plan.

Part A

A large black rectangular box redacting the content of Part A of the form.

Organisation and position (if applicable).

Date: 11 08 25

Do you wish to be notified of the Local Planning Authority's Decision to 'make' (adopt) the Plan, under Regulation 19 of the Neighbourhood Planning (General) Regulations 2012

Please delete as applicable: YES / ~~NO~~

Part B

Which part of the document does your representation relate to?

Paragraph number:

Policy reference: Policy 6

Do you support, oppose, or wish to comment on this paragraph? (Please tick)

Support ☒ Support with modifications ☐ Oppose ☐ Have comment ☐ Areas 19, 20, 21, 15

Please give details of your reasons for support or opposition or make comments:

These areas support a diversity of wildlife and 19 and 20 are used for grazing sheep. They are areas of natural beauty enjoyed by locals and visitors to Clipping Compton.

(What improvements or modifications would you suggest?)

These areas are under constant threat from developers who have no interest in their natural appeal and only want to make a lot of money in an unfair way.

Please make sure any additional pages are clearly labelled

Areas 19 and 20 are steep slopes which, if built on, could cause flooding.



COTSWOLD
District Council

www.cotswold.gov.uk

Chipping Campden Neighbourhood Development Plan: pre-examination consultation

Regulation 16 Consultation

Neighbourhood Planning Regulations 2012

Chipping Campden Town Council has submitted a Neighbourhood Development Plan. The Plan sets out a vision for the parish of Chipping Campden, covering both the town and Broad Campden and presents planning policies which they propose be used to determine planning applications locally.

The Neighbourhood Plan and supporting documents are available to view on our website.

All comments must be received by 12 noon on **15th August 2025**. There are a number of ways to make your comments:

Complete an [electronic response form](#)

Complete **this word version** below and email it to: neighbourhood.planning@cotswold.gov.uk

Print the form and post it to: Neighbourhood Planning, Cotswold District Council, Trinity Road, Cirencester, GL7 1PX.

We will accept other comments in writing (including electronic, such as e-mail, provided that a name and address is supplied. We cannot accept anonymous comments.

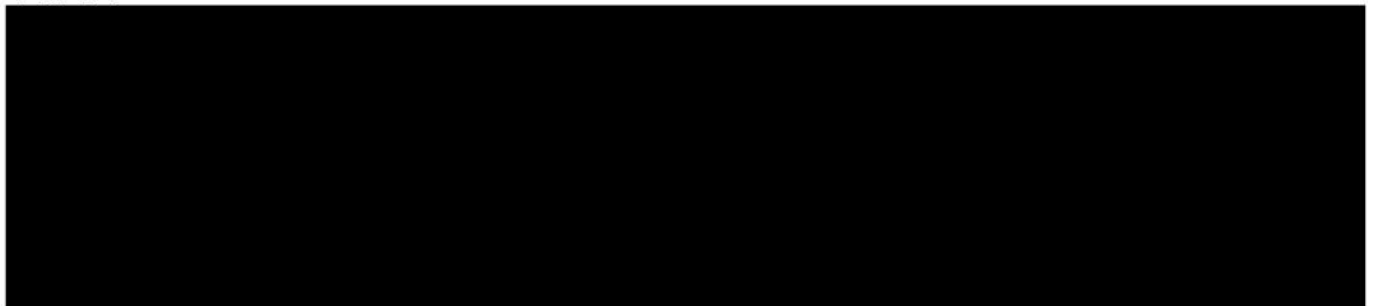
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How to use this form

Please complete Part A in full, in order for your representation to be taken into account at the Neighbourhood Plan examination.

Please complete Part B, identifying which paragraph your comment relates to. Repeat this for subsequent comments relating to other sections of the plan.

Part A

A large black rectangular box redacting the content of Part A of the form.

Email:

Organisation and position (if applicable):

Date: 11.08.25

Do you wish to be notified of the Local Planning Authority's Decision to 'make' (adopt) the Plan, under Regulation 19 of the Neighbourhood Planning (General) Regulations 2012

Please delete as applicable: YES / ~~NO~~

Part B

Which part of the document does your representation relate to?

P. 44 Community Aspirations

Paragraph number: Page 44

Policy reference:

Do you support, oppose, or wish to comment on this paragraph? P. 44 (Please tick)

Support ☐ Support with modifications ☒ Oppose ☒ Have comment ☐

Please give details of your reasons for support or opposition or make comments:

No more development until car parking is sorted because Chipping Campden cannot absorb any more traffic.

What improvements or modifications would you suggest?

Build and develop a car park.
(Not the school car park) P. 44

Please make sure any additional pages are clearly labelled



Part A



Organisation and position (if applicable): Local resident

Date: August 12th 2025

Do you wish to be notified of the Local Planning Authority's Decision to 'make' (adopt) the Plan, under Regulation 19 of the Neighbourhood Planning (General) Regulations 2012

Please delete as applicable: ***YES*** / NO

Part B

Which part of the document does your representation relate to?

Paragraph number: PAGES 85-88 'Local Green Spaces'

Policy reference: Policy 6

Do you support, oppose, or wish to comment on this paragraph? (Please tick)

Support ☐ ~~Support with modifications~~ ☐ ~~Oppose~~ ☐ **Have comment** ☐

Please give details of your reasons for support or opposition or make comments:

I absolutely support the inclusion of Local Green Spaces - they're hugely important for the mental and physical well-being of the Town's residents and visitors. My concern is that property developers have their eye on various spaces (most especially 19. The Hoo West 20. The Hoo East & 21. The Cley) and that 'letters of objection' have been received by the Town Council from those owners/developers (presumably about the designation and/or inclusion in the NDP), which in turn suggests to me that they intend to challenge the protected status of these spaces in order to build. In my view, this would be hugely detrimental to both the fabric of the Town and the natural landscape - part of the unique charm and joy of Chipping Campden is that it's simply folded into the valley between the hills, and to build in these areas would be to place this unique character under threat. My key concern, then, is that the 'Local Green Space' designation has real and genuine 'teeth' that means developers wouldn't be able build on those spaces, rather than them being able to relatively easily overturn it. In terms of traffic and services, any development in these areas would also have a significant impact on Back Ends - which is already very unsafe for pedestrians and cyclists given the speed many people drive along it. There is no footpath, inadequate signage and no traffic calming measures. [REDACTED], the level of safety is already unacceptable and would only worsen with development. Additionally, the coaches need somewhere else to park and wait for their passengers (valued and important visitors to the Town), rather than waiting with their engines running on Back Ends.

What improvements or modifications would you suggest?

[1] The Hoo, most especially, is a hugely important part of the natural fabric of Chipping Campden and deserves to be fully protected from development forthwith.

[2] Prevent coaches and other large lorries from driving along Back Ends.

[3] Footpath and traffic calming measures along Back Ends

Rep #17 - Gloucestershire County Council

To: Sent via e-mail.

Economy, Environment, and Infrastructure
Shire Hall, Westgate Street, Gloucester, GL1 2TG

Our Ref: 2025/07/CDC-CCNDPR16/AD

Your Ref:

Date: 12 August 2025

Dear Sir/Madam,

Chipping Campden Neighbourhood Plan, Regulation 16 Consultation

Thank you for consulting Gloucestershire County Council (GCC) on this matter.

GCC officers have reviewed the Regulation 16 consultation materials for the draft Neighbourhood Plan of Chipping Campden in Cotswold District.

Broadly, this officer response delves into the following main aspects:

- **Climate change** – officers provide additional references to achieve net-zero goals of the county. Officers request to explore a dedicated policy on climate change.
- **Transport** – officers advise mapping existing facilities, conducting studies to understand people's preferences regarding travel patterns (and choices), and arriving at a wish list of projects that the community would like to see. This acknowledging, that projects can only be delivered contingent on resources becoming available.

Officers would be grateful to remain notified of key decisions regarding this plan.

Detailed officer-level comments are as below.

Yours faithfully,



Senior Planning Officer
Gloucestershire County Council

DETAILED OFFICER COMMENTS

Archaeology

GCC officers have no further comments.

Climate Change

In addition to support of comments from Transport Planning (see below) on decarbonising the transport sector, GCC officers working on Climate Change and Air Quality would like to highlight that in 2022, the transport sector accounted for 32% of Gloucestershire's emissions. Furthermore, among all district and boroughs in the county, Cotswold District has the second highest emission footprint by private cars.

GCC officers would encourage further emphasis on climate change within the plan. Officers appreciate, that the draft neighbourhood plan makes some references to Cotswold's Local Plan regarding this. However, the local plan was adopted in 2018. It would be prudent for the draft neighbourhood plan to reflect upon more recent advances / legislative changes in building energy efficiency, renewable energy, and construction methods that can help achieve a low-carbon future.

To this end, we acknowledge the reference – within policy 3 in the draft plan on design and built environment – to the “Chipping Campden Design Guide” published in September 2024 that has a more up to date reflection of sustainable design principles. Officers would suggest making this reference (and implications) more prominent within the draft plan.

As a gentle reminder, the [Future Homes Standard](#) will be **published in autumn 2025** and will require carbon dioxide emissions produced by new homes to be 75-80% lower than those built to current standards.

Although tackling climate change is made implicit within the draft plan under various policies (e.g., Policy 5 on BNG and Local Nature Recovery), officers feel, the neighbourhood plan should have a dedicated policy on “climate change”. In this regard, the Moreton-in-Marsh Neighbourhood Plan is one reference document that has climate change as a dedicated policy (page 27): [The Plan | Plan](#).

Gloucestershire aspires to become Net Zero by 2045. With buildings and heating being our third highest carbon emitter for the county, the draft neighbourhood plan would be a good opportunity to encourage design and layout of new developments to maximise their potential to be as energy efficient as possible and to encourage the use of renewable energy.

Ecology

GCC officers have no further comments.

Fire and Rescue

GCC officers have no further comments.

Libraries

GCC officers have no further comments.

Minerals and Waste Planning

GCC officers have no further comments.

Public Health

GCC officers have no further comments.

Transport Planning

On **page 15**, as one objective under Traffic and Transport, the draft neighbourhood plan mentions "To improve the facilities and safety for cyclists and pedestrians". However, the draft plan does not appear to mention whether traffic speed or other barriers to active travel exist. That would be helpful to identify.

It may also benefit the plan to establish what safety issues currently prevent people from making shorter journeys on foot or by bike, to enable solutions to be found. A resident's survey might help gauge the need for active travel infrastructure. A community speed watch programme could provide evidence if speeds are an issue.

It's not currently clear in the plan what transport infrastructures are existing in the area; and whether facilities are accessible by walking, wheeling and scooting. The plan needs to set out what is expected of developers. For example, where can routes to school be improved with off-street infrastructure or perhaps providing formal or informal crossing points? Are there routes that people take to access shops, public transport or health care that a developer would need to link to or help improve?

In the [Gloucestershire Local Transport Plan \(LTP\) 2020-2041](#), a lack of high frequency bus services is identified for the area. Identifying local journeys through census data might help to establish whether developer contributions towards public transport would be of benefit. Do many people drive to a certain destination, which could make a bus service viable?

The LTP Policy 5.2 on "Rail Service Enhancements" states that GCC will:

"Work with the rail industry, local authorities and other stakeholders to consider the reinstatement of the rail link between Honeybourne and Stratford on Avon, as well as suitable other railway line reinstatements".

At present, GCC's LTP 2020-2041 does not have a policy specifically for a new Chipping Campden (Railway) Station. Therefore, officers request to please redact/delete the text reference on **page 48**: "requirements in the Local Transport Plan for a new station".

Having said that, officers are broadly supportive of better rail connectivity in the area. GCC's Rail Investment Strategy ([Gloucestershire Rail Study | September 2015](#)) has indicated significant economic gains from re-establishing the rail corridor. However,

line reopening would be a complex undertaking, requiring rail industry backing and a successful full business case. It is therefore considered a long-term aspiration.

It may be prudent to also consider opportunities for improving bus connections to Honeybourne and/or Moreton-in-Marsh to make other existing railway stations more accessible to local residents.

GCC have identified the need for a “mobility hub” adjacent to the Town Hall. Thus, officers would welcome reference to this, along with a consideration of public realm and bus stop facility enhancements to improve access to local bus services.

13 August 2025

Chipping Campden Town Council
Old Police Station
High Street
Chipping Campden,
Glos.
GL55 6HB

Sent via email: Neighbourhood.Planning@cotswold.gov.uk

Dear Sir/Madam,

Response to the emerging Chipping Campden Neighbourhood Development Plan 2023-2031 Regulation 15 consultation

This representation is submitted by Morgan Elliot Planning on behalf of our client, [REDACTED], in response to the Regulation 16 consultation on the Chipping Campden Neighbourhood Development Plan (the "Neighbourhood Plan").

Our comments relate specifically to the proposed designation of Local Green Space (LGS) sites 20 and 21, which include land within [REDACTED]'s part ownership and control. These are shown below:

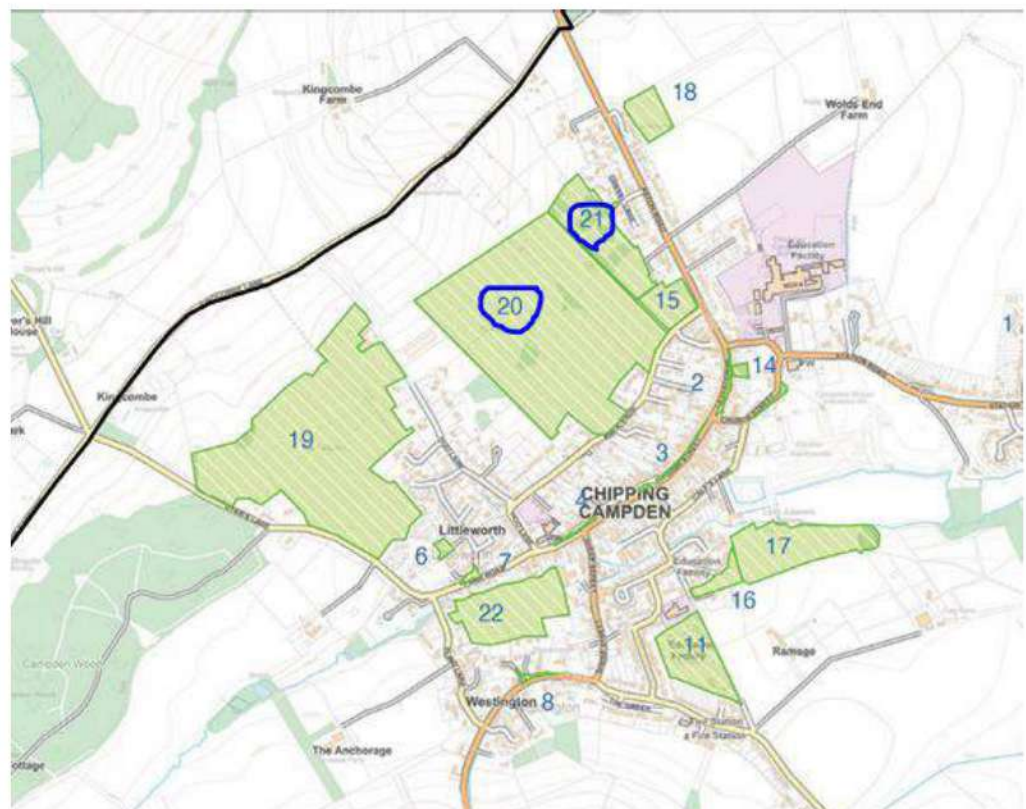


Figure 1 – Land at Local Green Space 20 and 21

Background and Procedural Context

Our client previously submitted a representation to the Regulation 14 consultation. That submission set out clear and evidence-based objections to the proposed designation of LGS20 (The Hoo East) and LGS21 (The Cley).

The Consultation Report (dated February 27, 2025) by Andrea Pellegram Ltd summarises the response on behalf of the Chipping Campden Neighbourhood Plan Group (CCNPG) as follows:

Copy of Andrea Pellegram Ltd summary of Regulation 14 Comments	Copy of Andrea Pellegram Ltd Response
The representation related to proposed local green spaces 20 and 21. With regard to LGS20 The Hoo East, the ownership details regarding the site are incorrect and [REDACTED] does not own the full extent of the site. With regard to LGS21 The Cley the land ownership details regarding the site area also incorrect. The representation from the landowner sets out justification why the sites do not meet the tests for LGS set out in the NPPF. The evidence is compelling, and the sites will be removed. The LPA also objected to the inclusion of site 20 because it was an extensive tract of land.	Noted. With regard to the question of whether these sites form extensive tracts of land, it is understood that this may not be the case, purely considering their size. The two sites are divided from each other by Hoo Lane and a wide strip of development and are considered by CCTC to be of different character and are therefore different sites providing different benefits and having different significance to the local community. The value/significance of the spaces is explained in site entries for site 20 and site 21 in Appendix 6, which were prepared by CCTC. In other respects, CCTC have reviewed the comments received and has resolved not to delete these sites and maintain their proposals for designation for the reasons set out in the appendix.

The Regulation 14 Consultation Statement prepared by Andrea Pellegram Ltd, on behalf of the Neighbourhood Plan Group, acknowledges the strength of the representation, stating:

- "The evidence is compelling and the sites will be removed; and
- "The LPA also objected to the inclusion of site 20 because it was an extensive tract of land".

However, **the sites have not been removed**, and instead, the justification for their designation stands without properly addressing the substantive issues raised by the LPA or the client.

Continued Factual Errors and Misrepresentation of Ownership

Despite being made aware of the issue at Regulation 14, the Neighbourhood Plan continues to present incorrect land ownership for both sites:

- **LGS20 (The Hoo East):** The site is not in single ownership. It comprises five separate land parcels, owned by different individuals. This fact was made clear in our Regulation 14 submission but has been ignored in the revised documentation (e.g., p.157 of the Plan).
- **LGS21 (The Cley):** The site boundary again misrepresents ownership and has not been corrected in the current version of the Plan.

This undermines the validity of the proposed designations. Meaningful consultation with affected landowners is a fundamental principle of neighbourhood planning, particularly in the designation of Local Green Space. The continued failure to reflect factual ownership data calls into question the transparency and robustness of the plan-making process.

Conflict with Sustainable Development Objectives

The designation of these sites risks undermining the ability of Chipping Campden to meet its housing needs. Paragraph 106 of the NPPF states:

- *“Local Green Space designation should be consistent with the local planning of sustainable development and **complement investment in sufficient homes, jobs and other essential services.**”*

Chipping Campden and Cotswold District Council suffers from a chronic housing market and affordability issue, which the Neighbourhood Plan fails to acknowledge or address. Notably:

- a. The current Cotswold Local Plan is over five years old;
- b. The District Council’s published housing land supply is just 1.85 years; and
- c. Over the last year, properties in Chipping Campden had an overall average sale price of £977,681.

As a consequence of points a) and b) above, the existing Development Plan is out of date, and the Neighbourhood Plan—if made now—would be out of date on the day of adoption.

Under usual circumstances, the LPA would advise that Neighbourhood Plan Groups pause their Neighbourhood Plan until updated Local Plans have been adopted.

Failure to Meet the NPPF Tests for Local Green Space Designation

The NPPF (paragraph 107) is explicit: land designated as Local Green Space must be (inter alia):

1. Demonstrably special to a local community, and holds particular local significance due to its beauty, historic significance, recreational value, tranquillity, or richness of wildlife;
2. Local in character and not an extensive tract of land.

The proposed designations of LGS20 and LGS21 fail to meet these tests on multiple grounds:

a. Unsubstantiated

No substantive evidence has been provided to show that either site is "demonstrably special" within the meaning of the NPPF. The submitted photographs are of poor quality, lack metadata, and do not meet standard published guidance on visual assessments.

The claim that the public right of way (PROW HCC5) through LGS20 is “well used” is not supported by any quantifiable evidence. We have reviewed heatmap data from Strava, which shows very low recorded usage of the footpath, contradicting the narrative of significant public value (See attached heatmap with arrow pointing to the low usage of the PROW).



Figure 1 – Strava Walking Use Heat Map

Furthermore, Page 157 claims that Part of Hoo (East) was identified as an Amenity Green Space in the CDC's Green Infrastructure, Open Space and Play Space Strategy, Aug 2017. However, this document has been superseded on 11th January 2024 and was adopted by Cabinet. The committee report stated that it needed to be updated to reflect the substantial changes to the NPPF and material considerations.

Therefore evidence base that is being relied upon is already out of date.

b. Extensive Tract of Land: Acknowledged by the LPA

At the Regulation 14 stage, the client objected to LGS20 on the basis that it represents an "extensive tract of land". The Neighbourhood Plan Group has not engaged with this objection, nor provided any justification as to why the site's scale is now considered appropriate. This directly contravenes the NPPF.

The explanation by Andrea Pellegram on behalf of the CCNPG states:

- *The two sites are divided from each other by Hoo Lane and a wide strip of development and are considered by CCTC to be of different character and are therefore different sites providing different benefits and having different significance to the local community.*

The Consultation 14 representation highlighted that LGS 20 is an expansive tract of land. Whereas the response from the CCNPG discusses the sites contributing together as an expansive tract of land. This completely misses the point that the representation assesses each proposed LGS designation individually.

Also, there is not a wide strip of development, so it is not clear whether this response is even commenting on the sites in question. The response to the consultation process is considered poor.

c. Arbitrary Boundaries

The boundary of LGS20 has been drawn arbitrarily, seemingly to include the PROW. This is not a legitimate basis for designation. Simply being visible from a PROW, or adjacent to residential areas, is not sufficient to justify protection under the LGS policy.

Updates to the National Planning Policy Assessment since Regulation 14

Morgan Elliot Planning has thoroughly reviewed the proposed LGS designations against the requirements of the National Planning Policy Framework (NPPF). I draw the Neighbourhood Plan Groups' (NPG) attention to Paragraphs 105 and 106.

Paragraph 106 sets out that:

- The designation of land as Local Green Space through local and neighbourhood plans allows communities to identify and protect green areas of particular importance to them. Designating land as Local Green Space should be consistent with the local planning of sustainable development and **complement investment in sufficient homes, jobs and other essential services. Local Green Spaces should only be designated when a plan is prepared or updated, and be capable of enduring beyond the end of the plan period.**

Paragraph 107 sets out that Local Green Space designation should only be used where the green space is:

- a) in reasonably close proximity to the community it serves;
- b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and**
- c) local in character and is not an extensive tract of land.**

Planning Assessment

Due to the recent update to the NPPF, this representation also includes an updated assessment, which is present below for the examiner's convenience.

Paragraph 106 Test

In relation to Paragraph 106 of the NPPF, and given the characteristics of both of these sites, it is not clear how they're consistent with local planning of sustainable development. Further, both sites, unequivocally, do not complement investment in sufficient homes, jobs and other essential services; in fact, it would appear that they are being used as a tool to put a hurdle in front of investment opportunities.

Relevant to LGS 20, a pre-application enquiry is currently live with the Council for development along Backends. The Council is currently receiving applications for edge of settlement areas to assist in meeting their chronic shortfall of 1.85 years.

Moreover, Local Green Spaces should provide a range of social, economic and environmental benefits. This is one of the basic conditions for neighbourhood plans. I am not clear what economic benefits the LGS designations provide. The PROW is protected under the Highway Act and therefore, there is no need to further impose protection on this.

Paragraph 107 Test

When reviewing Paragraph 107 of the NPPF, neither site would meet the criteria.

Criteria	Site
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	Local Green Space 20 - The Hoo East	Local Green Space 21 - The Cley
a) in reasonably close proximity to the community it serves	The completion of the 'close to the community it serves' box should describe the proximity of the green space to the local community. The space should be within easy walking distance to meet this criterion satisfactorily. The public right of way is clearly accessible; however, the land to the south, towards Backend, is not accessible, and it is not clear from the evidence what the land serves for the community.	The site is not accessible, and therefore, it is not clear what purpose this land serves to the community.
b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife	The 'demonstrably special to local community' should describe the ways in which the space is used or enjoyed by the community. The outcomes of community engagement should be useful in demonstrating that space is special to the community. We recognise that the CCNPG rely on Footpath HCC5. However, it has not been demonstrated why this is special. There are photographs uploaded which do not indicate where the photographs are taken from and they don't appear to be showing anything particularly or demonstrably special. The site is located in the Cotswold National Landscape, which provides a degree of landscape protection; therefore, the LGS designation is borderline unnecessary and is only being used as a tool to put hurdles in front of investment.	Whilst the NPG includes text that includes details of the TPO and other designations. It is not clear how the Local Green Space Designation is demonstrably special to the local community. The site is constrained, and a Local Green Space designation is not considered necessary, and the site is not considered demonstrably special to the local community. The trees on site are already protected, and it is necessary to consider whether the additional designation is necessary and would serve a useful purpose. Furthermore, in considering whether a space is demonstrably special to a local community, it is clearly important to engage with the community and to assess how the community uses a space. The space has not been used and is solely in private ownership with no opportunity for community use. It's not clear at all from the evidence

	Further evidence is required to justify the extent of the land proposed.	what purpose this serves to the local community.
c) local in character and is not an extensive tract of land.	Consideration of whether the green space is local in character and not an extensive tract of land suggests spaces within a locality, rather than, for example, extensive green areas in the countryside around a settlement. The 'Local in character and not extensive tract' box should be used to demonstrate that the space in question is a local facility and not, for example, green space in the countryside around a settlement. The purpose of Local Green Space designation is to protect local spaces. The parcel of land is arguably found in other areas of the National Landscape and is not particularly special or locally significant in character to Chipping Campden. Containing urban sprawl or protecting open countryside would not be proper uses of the designation.	The NPG sets out that this green space is an area of natural pasture and wild woodland, the last in the area. The land is privately owned and is being managed by the landowner, which various felling licenses granted due to the limited value many of the trees have. The evidence base shows nothing to suggest that the site local in character.

Conclusions

The proposed designation of LGS20 (The Hoo East) and LGS21 (The Cley) is fundamentally flawed, both in process and in substance.

At the Regulation 14 stage, our client submitted clear, evidence-based objections to these designations. These concerns were acknowledged by the Neighbourhood Plan Group's own consultant, who described the evidence as "compelling" and recommended the removal of the sites. It's also suggested that the Local Planning Authority objected to LGS20 on the basis that it constitutes an extensive tract of land, contrary to the NPPF.

Despite this, the sites have not been removed. Instead, the Neighbourhood Plan continues to rely on inaccurate landownership data, insufficient evidence, and unsubstantiated claims of community value. No meaningful effort has been made to address the issues raised—either with the landowner or the Local Planning Authority—nor has there been compliance with the procedural expectation of genuine stakeholder engagement.

In planning terms, both sites fail to meet the tests for Local Green Space designation set out in Paragraphs 105–107 of the NPPF. The designation appears to serve no clear purpose beyond restricting future development, contrary to the requirement that such designations support sustainable development and complement investment in homes, jobs, and services (Paragraph 106 of the NPPF).

This is particularly critical in a context where:

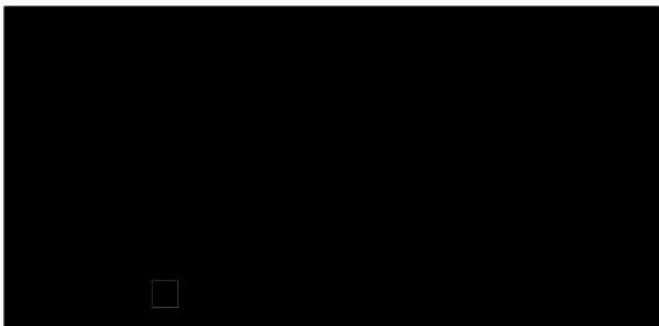
- Evidence base relied upon is out of date;
- The Cotswold Local Plan is currently out of date;
- The Council can demonstrate only 1.85 years of housing land supply;
- The Neighbourhood Plan itself risks being out of date immediately upon adoption.

Given these factors and the absence of any demonstrable local significance for these sites, their continued inclusion as Local Green Spaces is not justified and would result in an unsound approach to Local Green Space Policy that would not stand up to scrutiny over the course of the current development plan period.

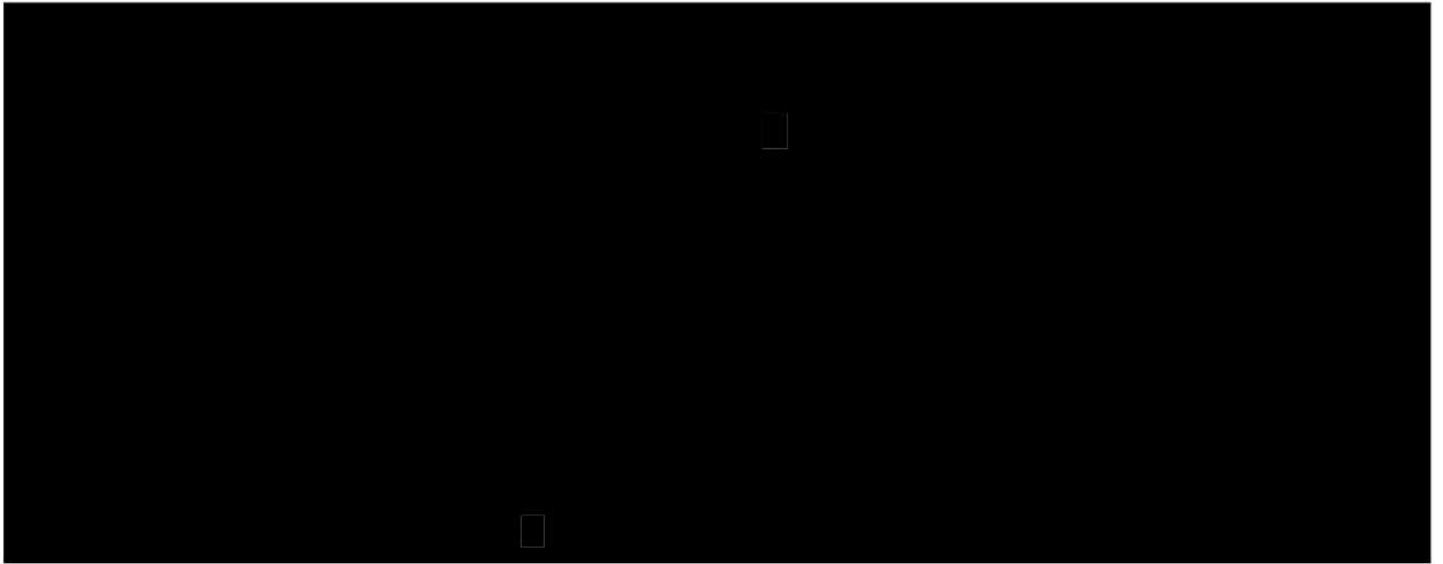
We respectfully request that the Examiner recommend the removal of LGS20 and LGS21 from the Neighbourhood Plan in order to ensure that it meets the basic conditions and conforms with national policy, including the NPPF.

Should the Examiner require any further evidence, ownership plans, or supporting information, we would be pleased to assist.

Yours Sincerely,



Rep #19 - on behalf of Landowner (different to #18)



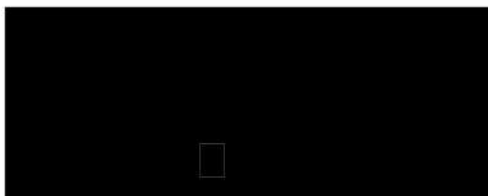
Dear Sir/Madam,

On behalf of the Campden Estate, I am pleased to attach a response to the Chipping Campden Neighbourhood Development Plan: pre-examination consultation (Regulation 16). This should be read alongside Figures 16 and 17 attached.

As per the representation, I have highlighted that a representation we submitted in the Regulation 14 consultation last year has not been considered in the 'Consultation Report' Annex C, and therefore I am concerned this has not been considered as part of the overall neighbourhood plan process. Please can you confirm? I attach the email I originally sent with the representation attached.

Please can you confirm receipt of the attachments in this email?

Kind regards,



morganelliott
planning

Registered in England and Wales. No.14455430

13 August 2025

Neighbourhood Planning
Cotswold District Council
Trinity Road
Cirencester
GL7 1PX

Sent via email: neighbourhood.planning@cotswold.gov.uk

Dear Sir/Madam,

Response to the Chipping Campden Neighbourhood Development Plan: pre-examination consultation (Regulation 16) – Westington Quarry, Chipping Campden.

This representation has been prepared by Morgan Elliot Planning on behalf of our client the Campden Estate in response to the emerging Chipping Campden Neighbourhood Development Plan pre-examination consultation (Regulation 16 of The Neighbourhood Planning (General) Regulations 2012) which is running until 15th August 2025.

This representation follows previous representations submitted by the Campden Estate in response to the Regulation 14 consultation that took place in May 2024, the first promoting the site known as Westington Quarry for a mixed use development and providing comments on a proposed 'key view' (see **Appendix 1**), and the second responding to draft Policy 5 'Environment and Biodiversity Net Gain' (see **Appendix 2**).

Having reviewed Annex C 'Consultation Report' that accompanies this consultation, and it has come to our attention that the representation in **Appendix 1** has not been included in this report and therefore, we are concerned that this representation has not been formally considered. We request confirmation from the Neighbourhood Plan steering group as to whether this representation was reviewed as part of the previous consultation and expect a response to its contents.

A detailed review of the remaining consultation documentation that supports the emerging Neighbourhood Plan Regulation 16 consultation has been undertaken and broadly, it is noted that the same policy principles remain. It is noted that the emerging Neighbourhood Plan continues not to allocate any land for development, the key view remains as previously proposed, and Policy 5 remains as previously drafted, although the accompanying text to this policy has been amended.

The following response comments on each of these aspects in the context of updates that have been published since, including updates to the National Planning Policy Framework (NPPF), the district council's need to find additional sites for development, and the progression of the draft Local Nature Recovery

Strategy for Gloucestershire. Where relevant, this response will draw on the previous representations contained in the accompanying appendices.

The Need for New Development

Since the previous Neighbourhood Plan consultation, the district Council are now required to find additional sites for development given the updates to the NPPF and the local housing need figures. The revised NPPF was published in December 2024 (updated in February 2025) and sets out revised housing targets for local authorities. For Cotswold District Council, the annual local housing need figure rose from 504 dwellings per annum to 1,036 dwellings. In June 2025, the Council published an updated Housing Land Supply Report which took this new annual local housing need figure into account, resulting in the Council only being able to demonstrate a 1.8 year supply of housing.

Whilst a Neighbourhood Plan is not obliged to allocate sites for development, the Neighbourhood Plan body should work closely with the Local Planning Authority (LPA) to ensure that emerging evidence of development need within the neighbourhood plan area, whether residential or commercial, is addressed. In our view, the Neighbourhood Plan consultation documentation has not identified whether further evidence gathering has been undertaken to reflect the clear need for additional sites to come forward in the district, particularly as Chipping Campden is identified as a sustainable settlement to accommodate growth.

Whilst the proposals at Westington Quarry do not seek to deliver residential development, the delivery of commercial uses can help support the need to deliver further residential development in such locations. Indeed, the different uses support one another. The emerging Neighbourhood Plan should therefore recognise the need to deliver further development within the area. Otherwise, there is the risk that the Neighbourhood Plan once made, will become out of date almost immediately.

The PPG is clear that *“Where a neighbourhood plan is brought forward before an up-to-date local plan is in place the qualifying body and the local planning authority should discuss and aim to agree the relationship between policies in”* inter alia *“the emerging neighbourhood plan...with appropriate regard to national policy and guidance.”* It goes on to state that *“It is important to minimise any conflicts between policies in the neighbourhood plan and those in the emerging local plan, including housing supply policies.”*

The Cotswold Local Plan is now 7 years old and therefore out of date. It is understood that the district Council are looking to update their Local Plan, with a view to submitting it to the Secretary of State in December 2026. Consequently, it is planned that there will be a Regulation 19 consultation in Autumn 2025. This will be based on the need to find sites to meet the inflated local housing need figures. Clearly, any neighbourhood plans emerging should align with such targets.

To support such development, the emerging Neighbourhood Plan should also recognise the importance of delivering commercial uses that can provide local job opportunities, hotel and leisure uses that can support tourism for the district, and the ability for leisure uses to be utilised by the local community, all of which support residential development.

The proposals at Westington Quarry, contained in **Appendix 1**, provide a rare and exciting opportunity to deliver these principles, enabling enhanced job prospects and community facilities within the area, supporting not only the existing community but the future growth of Chipping Campden.

The site remains available, suitable and achievable for development, and therefore is deliverable as defined in the NPPF. We respectfully request that the site is considered as an allocation for development in the emerging Neighbourhood Plan.

Landscape and Ecology

Landscape

In the previous representation submitted contained in **Appendix 1**, comments were made in relation to Figure 5 of the Neighbourhood Plan consultation document which identified a key view just west of the Westington Quarry site directed towards Chipping Campden north east. It was requested that the key view was amended given the viewpoint proposed by the Neighbourhood Plan is a topographic highpoint bounded by dense tree cover, and therefore there is no long distant view from this location. From a review of the latest Neighbourhood Plan consultation document it is noted that this has not been amended.

As there is no response to the representation we submitted previously, it is unclear why this has not been amended. However, given the reason above, it is respectfully requested that this is amended to a key view that can be experienced at the entrance of Stanleys Quarry and Westington Hill where the view northwards opens up:

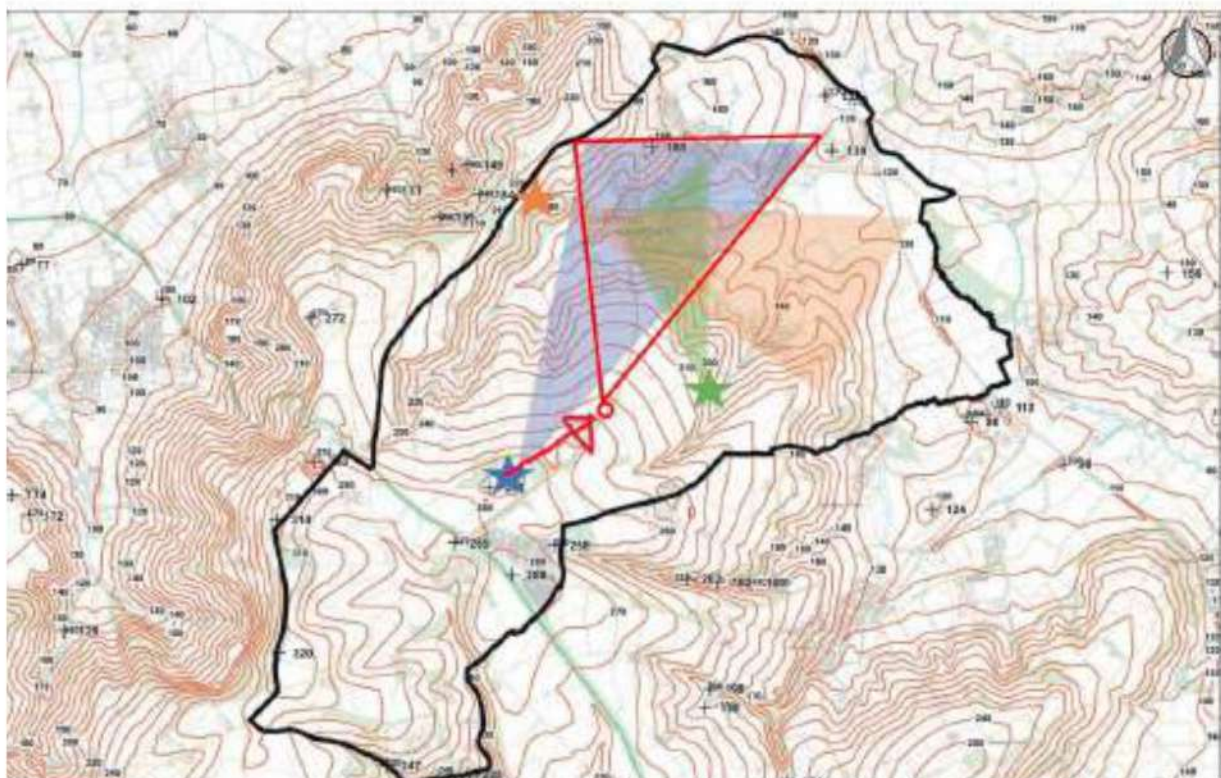


Figure 1 - Plan suggesting amendment to key view (Figure 5 in Neighbourhood Plan consultation document).

Local Nature Recovery Areas and BNG

The other representation submitted by Campden Estate in the last consultation solely responded to draft Policy 5 'Environment and Biodiversity Net Gain'. Having reviewed the 'Consultation Report' at Annex C, it is noted that the following points of this representation have been addressed in the latest consultation document:

Campden Estate comment	NP Steering Group response
1) The representation states that the text is not clear whether the areas identified in Figure 15 are of existing ecological value or as areas to provide green corridors between areas of ecological value (2.1). The response has requested that land be deleted from the Figure and the appendix but has not stated why these sites are not good locations for nature recovery and improvement. The respondent asked for Policy 5 to be deleted in its entirety.	The text now makes it clearer what the basis for the identification of locations is and how they might play a role in delivering nature recovery and improvement in the parish. Whilst there is a request to delete land identified, CCTC has decided not to do this on the basis that the locations identified as optimum or most ecologically significant locations for nature recovery and improvement. It acknowledges data limitations (the age of the data) but reaches the broad conclusion that the locations identified are likely to remain those with the most potential. It is also acknowledged that it is up to landowners what they do with their land with respect to nature initiatives. It clearly states that development is not precluded by the CCNDP on these points. The policy requires that applicant demonstrate that they have actively considered/sought use of local locations identified where their BNG obligations cannot be met on site. As set out above in relation to the Northwick Estate response, CCTC believe that the CCNDP approach is consistent with PPG in providing local detail to contribute to LNRS development and BNG implementation.
2) The response raises concern regarding text wording.	The response from the LPA has led to significant changes being made to the text of the CCNDP and it is hoped that this will allay the concerns raised in this representation. The text and policy wording should assist landowners in the identified areas to create BNG

	opportunities and plans for their sites (including by putting them on the BNG register). The policy is means to be supportive of this aim
3) The respondent also raised concerns that the data in support of the CCNDP was from 2017 and therefore likely to be out of date.	The Northwick Estate and CDC raised a similar concern and an acknowledgement has been added to the CCNDP text as follows, 'These are based on data provided by the Gloucestershire Environmental Records Centre. It is acknowledged that the report (published in 2017) relies on data from that time and more recent data will be available, but it is considered to remain a realistic and credible representation of nature recovery and improvement potential in the area.' The CCNDP must be based on evidence and the qualifying body secured evidence in 2017. Given the nature of the information and the lack of significant change since 2017, the data in the report is considered sufficient to allow locations to be identified as potentially optimum for local nature recovery and improvement. It is acknowledged that landowners have freedom to act in accordance with their own objectives and that the identification of the locations does not preclude development. The LRNS will add significant detail. The requirement is to show active consideration of the use of these locations where BNG obligations cannot be met onsite, to provide the best opportunity to promote for the parish BNG benefits required from developments in the parish.

In light of the above, the Estate wishes to make the following further comments.

In response to point 1), whilst we accept that Local Recovery Nature Areas do not necessarily preclude development from coming forward, they can influence it.

Furthermore, since the publishment of the last Neighbourhood Plan consultation, the draft Local Recovery Nature Strategy for Gloucestershire has progressed and the interactive map supporting it does not identify the entirety of Westington Quarry as a Nature Recovery Area (see Figure 2 below). It is therefore disingenuous for the emerging Neighbourhood Plan to identify the entirety of the site as a Local Recovery Nature Area. Indeed, the screenshot taken from the draft Local Recovery Nature Strategy for Gloucestershire

identifies areas of 'Woodland: Medium Priority' where woodland does not exist. Rather this area comprises land associated with the B2/B8 uses on site and should also be removed as a Local Recovery Nature Area. This demonstrates why the extent of the site proposed is not deemed suitable as a Local Recovery Nature Area.



Figure 2 - Extract of Westington Quarry taken from the Gloucestershire's Natural Capital website.

Consequently, it is proposed that Figure 16 and the plan that accompanies Local Nature Recovery Area 11 in Appendix 6 are revised to omit the Westington Quarry site as Local Recovery Nature Areas. Enclosed within the submission of this representation are two revised plans to be inserted in the next iteration of the Neighbourhood Plan, for ease.

In response to point 2) in the table above, a review of the amended wording has been undertaken. Whilst some changes have been made to the text accompanying Policy 5 which we agree with, that make clear that Local Nature Recovery Areas do not preclude development and that it is up to the landowners to decide whether they want to carry forward their land as part of a nature recovery area, there other areas which we request are amended further:

- Page 78: Remove *"This should be referred to by landowners and scheme proposers when devising schemes"*. This seems restrictive and therefore does not align with the principle that Local Recovery Nature Areas do not preclude development coming forward.
- Policy 5 should be removed as it still remains our view that the draft Local Nature Recovery Area for Gloucestershire is the appropriate document to designate such areas, rather than the

Neighbourhood Plan. However, in the event that Policy 5 remains, the first paragraph should be reworded to the following:

“Land identified in Table 7, Figure 16 and Appendix 6 is highlighted as being of particular importance with high opportunities for nature recovery and improvement. These areas should be considered alongside the Local Nature Recovery Areas that are designated in the Gloucestershire Local Nature Recovery Map under provisions of the Environment Act 2021.”

The Estate note the response to point 3).

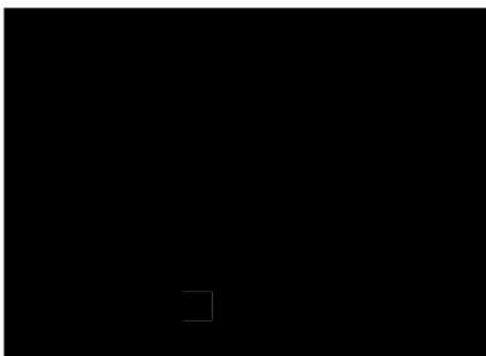
Notwithstanding the above, it still remains the case that the Campden Estate have not been approached by Gloucestershire County Council nor the Neighbourhood Plan steering group about the potential designation of this site as a Local Nature Recovery Area.

Paragraph 89 of the 2023 DEFRA guidance states, *“If the responsible authority knows that a landowner opposes a potential measure on their land and is very unlikely to choose to carry it out, it would be better to explore alternatives or include other more suitable measures before public consultation. This is particularly important if they propose a location due to its potential to join up areas of habitat to create a wider network. If objections from landowners only become clear at public consultation, the responsible authority should try to accommodate their views where this does not undermine the coherence and ambition of the strategy as a whole.”*

It therefore is superfluous including Westington Quarry as a Local Nature Recovery Area and we respectfully request its proposed designation is removed as part of the next iteration of the Neighbourhood Plan process.

Comments around BNG remain as per the representation submitted previously within **Appendix 2**. With regard to the wording of Policy 5, if this is to remain, part c) seems overtly restrictive by suggesting that any off site BNG must be directed to the Local Nature Recovery Areas shown in Figure 16 of the consultation document. However, clearly, if these Local Nature Recovery Areas do not preclude development, and that there has to be landowner agreement, BNG cannot be directed towards such areas. The Estate support the principle of delivering BNG but the wording as drafted in Policy 5 c) is restrictive and should be removed.

Yours Sincerely,



Appendix 1 – Previous representation supporting the development of Westington Quarry (Regulation 14 consultation)

22 May 2024

Chipping Campden Town Council
Old Police Station
High Street
Chipping Campden,
Glos.
GL55 6HB



Dear Sir/Madam

Response to the emerging Chipping Campden Neighbourhood Development Plan 2023-2031 Regulation 14 consultation – Westington Quarry, Chipping Campden

This representation has been prepared by Morgan Elliot Planning on behalf of our client the Campden Estate in response to the emerging Chipping Campden Neighbourhood Development Plan 2023-2031 Regulation 14 consultation that is running from 8th April to 22nd May 2024.

From reviewing the survey questionnaire it is understood that there is no specific opportunity to submit a Call for Site representation. However, following an email exchange with the clerk of the Town Council on 4th May 2024, it is understood that *“Residents may respond in any way they feel appropriate and it is not for the town council to direct those comments.”*

As a result, this representation demonstrates the deliverability of the site known as Westington Quarry for a mixed use development comprising a hotel (Use Class C1), a spa facility (Use Class E), an employment work hub and flexible office/workshop space (Use Class E) and the opportunity for live/work units (Sui Generis). **Appendix 1** includes a site location plan depicting the exact extent of the site. **Appendix 2** contains a Concept Document illustrating indicatively how the site could accommodate such uses. Following this, the representation will make comment on how the proposals meet the aspirations of the emerging Neighbourhood Plan, specifically addressing question 1 of the consultation response form.

Before delving in, it's worth noting that a representation was submitted on 29th March 2024 in response to Cotswold District Council's recent Call for Site's consultation which similarly supported the site's development for the aforementioned proposals. The representation also highlighted the site's ability to tie in with proposed development strategy 'Scenario 3: Dispersed Growth' given the site sits within the open countryside. This scenario provides a stronger emphasis on small to medium-scale development outside of Principal Settlements, key settlements where growth has been favoured towards by Cotswold District Council.

Notwithstanding this, given the site's proximity to Chipping Campden (approximately 1.3 miles south west of the settlement) and the opportunity for sustainable transport links from the site to Chipping Campden (see Section 1.4 of the Concept Document) it is considered the site is within a sustainable location for the development proposed, particularly when having regard to Paragraphs 89 and 109 of the NPPF:

“Planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport. In these circumstances it will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable (for example by improving the scope for access on foot, by cycling or by public transport). The use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist.” [own emphasis added]

“The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.” [own emphasis added]

Call for Sites submission

As an overview, the proposals provide the opportunity to restore what is a former, unsightly quarry and a former factory within a sensitive part of the landscape to a high quality, naturalistic and sustainably designed scheme that will deliver significant benefits to the local economy. These benefits will be further supported by sustained environmental benefits including landscape enhancements and biodiversity net gains. Furthermore, with the site’s proximity to Chipping Campden, the national cycle route that runs through the town as well as the local PROW network, there is the opportunity to connect and enhance connectivity to local services and sustainable transport routes.

Background Context

The accompanying Concept Document sections 1.1-1.14 detail the site’s context, history and site analysis. Located off the B4081, the site comprises a former quarry use of which has now ceased. Presently, the site’s western half and eastern boundary comprise a B2 Use Class due to a former Biomass Facility on site¹. The central part of the site comprises B8 Use Class used for storage and distribution². Figure 1 below depicts the two different uses.

¹ Ref. 16/0111/CWMAJW

² Ref. 18/04957/CLEUD



Figure 1 - Plan depicting different use classes that exist on site.

The site therefore comprises brownfield land and its redevelopment should therefore be given substantial weight in line with Paragraph 124 c) of the NPPF, notwithstanding the support within Paragraph 89 of the NPPF for the redevelopment of such sites for employment uses in rural areas (as above).

In addition to the above, the site measures 4.45 ha in size and comprises two distinct levels in topography. The eastern half of the site sits on a similar level to the B4081 whilst the western half sits at a lower level encompassed by steep slopes and dense tree planting. Immediately north, east and west is existing woodland and along the site's southern boundary lies the B4081. Further south lies Lapstone Barn, a wedding venue. Outside the site's south western corner is an existing property used as self-catered holiday accommodation. An existing access into the site is located towards the site's south eastern corner providing direct access onto the B4081. Another highway access is located further north along the B4081. In the surrounding context towards Chipping Campden is a local PROW and bridleway network.

The B4081 in a north easterly direction provides direct access to Chipping Campden (approximately 1.3 miles in distance). Chipping Campden comprises several services and facilities including a church, shops, cafes/restaurants, a Co-operative, Chipping Campden school and theatre. It also contains several bus stops, the closest to the site being on Westington Corner which provides regular services Monday to Saturday to Stratford-upon-Avon, Blockley, Moreton-in-Marsh train station and Mickleton. Chipping Campden also contains a national cycle route.

In a south westerly direction the B4081 provides direct access onto the A44 which northbound provides access in Broadway (approximately 4.3 miles in distance from the site) which also contains a variety of services and facilities; and southbound provides access to Moreton-in-Marsh (approximately 6.3 miles in distance from the site) again containing a variety of services and facilities including a train station.

In terms of the site's designations, the site sits within the Cotswold National Landscape and within a low risk zone for flooding (Flood Zone 1). A group Tree Preservation Order covers trees that run along the site's southern

boundary adjacent to the B4081 (ref. 06/00078/TPO) which will be retained as part of any future development. There are no historic or ecological designations attached to the site. There is therefore a low level of constraints attached to the site.

Site Deliverability

Paragraph 85 of the NPPF state that *“Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future.”*

Paragraph 69 states strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing and employment land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Planning policies should identify a supply of:

- a) *“Specific, deliverable sites for five years following the intended date of adoption; and*
- b) *Specific, developable sites or broad locations for growth, for the subsequent years 6-10 and, where possible, for years 11-15 of the plan period.”*

Annex 2 within the Framework defines ‘deliverable’ as the following:

“To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the Site within five years.”

The following demonstrates the deliverability of the Site in its entirety as per the definition above.

Available

The site comprises previously developed land and is being actively promoted by the landowner. There are no known legal arrangements, complex land ownerships or significant constraints which would prevent the site coming forward in a timely manner or limit development. The site can, therefore, be considered to be developable and available.

Suitable

The site has no physical constraints that would prevent or delay development coming forward. The site is suitably and sustainably located for the mixed use development proposed with the opportunity to deliver enhanced sustainable accessibility to services and facilities via sustainable modes of transport and key highway infrastructure. Accordingly, the site is clearly a suitable location for the type of mixed use development proposed.

Achievable

This site sits within the open countryside but within close proximity to Chipping Campden and key, local highways infrastructure. The proposed allocation will enhance the vitality of Chipping Campden and inherently support the facilities and services within it. As demonstrated throughout this representation, a mixed use

development of this nature at the site represents a viable future use which can be delivered quickly. As such, development of the site can be considered achievable within a 5-10-year period.

Response to the emerging Neighbourhood Plan consultation

Vision and objectives

The following sections seeks to answer question 1 of the consultation response form.

From reviewing the emerging Neighbourhood Plan consultation document it is considered that the proposed redevelopment of this site aligns with its proposed vision and objectives.

The proposed vision has been broken down below, enabling us to demonstrate how the proposals will meet its aspirations:

- *“A vibrant community, renowned for its creativity, culture and commerce, as much as for the beauty of its buildings and natural surroundings.”*

The proposals at Westington Quarry will retain and enhance the creativity and commerce elements of Chipping Campden by expanding upon its employment offering through the delivery of offices and workshops on site. There is also opportunity to enhance the ‘cultural’ aspect by tailoring the offering to the ‘arts and crafts’ industry. As per the vision document, the Campden Estate is developing a collaboration with one of the leading UK universities of the creative arts alongside one of the UK’s leading creative branding agencies. The proposals intend to offer a workspace on site that will underpin this concept.

We also recognise the importance of the beauty of this part of the district, comprising the Cotswold National Landscape as well as a number of heritage assets. Given Westington Quarry sits within the Cotswold National Landscape, the proposals have been landscape led. Noting the existing state of the site, the proposed development will conserve and enhance this part of the designated landscape, a clear benefit to the scheme. Consequently, the site’s redevelopment will further enhance the beauty of this part of the district.

- *“A society working together to realise the potential of our young people, to develop our businesses, and to provide financially rewarding work.”*

Each element of the proposals will bring a considerable number of local job opportunities for the area both in the hospitality industry as well as provide commercial floorspace that can be accommodated by existing businesses and new start-up businesses. As well as diversifying the employment opportunities within this part of the district, the proposals also have the ability to attract a younger population to Chipping Campden who can help support existing services and facilities within the town and more generally in the North Cotswolds.

- *“Fulfilling activities for all our residents and amenities for all visitors to the area.”*

The proposed spa facility will be separate from the hotel. Whilst hotel guests will be able to use its facilities, so will users outside the hotel including the existing local community within the town. As part of the facility there will also be a gym on site that will support the proposed commercial use on site as well as be open to the wider community.

Consequently, we support the emerging Neighbourhood Plan's proposed vision. Naturally, we are also supportive of the proposed objectives that help to achieve this vision. Those that directly relate to the proposals at Westington Quarry include the 'environment and sustainability', 'economy', 'design', 'facilities, services and amenities' and 'traffic and transport' objectives. In particular, we consider the proposed development will *"strengthen the vitality and viability of the town centre"* by encouraging further footfall for the town through the provision of tourist attractions and employment opportunities on site. The consultation recognises that the tourism economy is important contributor for the economy of Chipping Campden. We wholly agree with the following statement within the consultation document that supports this:

"The visitor economy is crucial to the well-being of permanent residents because their trade keeps small local businesses open and boosts the local economy to provide for more eateries, pubs and cafes than would normally be possible in such a small settlement. Providing for and supporting tourism is critical to the continued success of Chipping Campden town centre."

However, we note that the consultation document goes onto state:

"However, tourism brings negative impacts as well and these must be managed. Overnight visitors are better located in the town centre where they can walk to shops and hostelryes; and existing shops, which create the vibrant and enjoyable town centre experience and create its character, should be protected."

Whilst Westington Quarry sits outside Chipping Campden's town centre, it is not considered the proposed uses would negatively impact on the town centre. Whilst Figure 13 of the consultation document estimates the amount of self-catered accommodation and hotels in Chipping Campden, the subject proposals comprise a hotel and spa use that is unique to the local area. Set within a naturalistic landscape, as demonstrated by the vision document, the proposals will offer a tranquil and calm environment that will be seen as a destination in its own right. This diversifies the tourism offer within the local area. Notwithstanding this, as mentioned above, sustainable connectivity is a key principle incorporated into the scheme so the future users of the site have access to the existing services and facilities within the town centre, helping to increase the vitality and viability of the town. As such, the site is not isolated from the town centre. Rather, the aim is to provide the ability for guests, both day and night, to access to the town centre sustainably, ensuring it remains a vibrant place. Consequently, the redevelopment of Westington Quarry would not harm the role of the town. In addition, the sustainable transport opportunities help support the Neighbourhood Plan's objective to *"improve the facilities and safety for cyclists and pedestrians."*

Similarly, the commercial development proposed does not harm the role of the town centre, providing a workplace for existing companies and new, start-up companies, with a particular focus on providing a space that the 'cultural' industry can benefit from. Whilst offices are technically a 'town centre use', there is national planning policy support for employment uses within rural areas that are often found outside of town centres. This relates to Paragraph 89 of the NPPF (quoted above) and paragraph 88:

"Planning policies and decisions should enable:

- *The sustainable growth and expansion of all types of businesses in rural areas, both through conversion of existing buildings and well-designed, beautiful new buildings;*
- *Sustainable rural tourism and leisure developments which respect the character of the countryside."*

Conversely, weight should be placed on the fact that the proposed hotel and spa facility will *"improve the town's tourism offer"* whilst the proposed offices and workspaces will *"encourage start-up businesses"*, two objectives

proposed within the consultation document. Consequently, the hotel and spa will ensure that the local community has appropriate access to sports/leisure facilities.

Altogether, the proposals meet the primary economic objective to *“protect and develop the town’s economy.”* This ties in with the National Planning Policy Framework which places *“significant weight”* on *“the need support economic growth and productivity, taking into account both local business needs and wider opportunities for development”* and to help support a prosperous rural economy, also echoed in the current and emerging Cotswold Local Plan.

This matter is considered even more important when reading this against the Census 2021 statistics which demonstrates Chipping Campden as having a *“lower level of economic activity than for England”* as recognised by the Neighbourhood Plan consultation document. Chipping Campden has 49% of the population as economically active compared with 57% for England. There is clearly opportunity to increase the job prospects within this part of the district, which the redevelopment of Westington Quarry can assist with.

To conclude, the proposals at Westington Quarry tie in with the proposed vision and objectives of the emerging Chipping Campden Neighbourhood Plan and therefore, we respectfully request that the site is seen as a proposed allocation within the Neighbourhood Plan or at least recognised as a site that can accommodate employment generating development.

Landscape and ecology

With regard to landscape, Figure 5 of the consultation document identifies a key view just west of the site directed towards Chipping Campden north east. This view is a topographic highpoint but bounded by dense tree

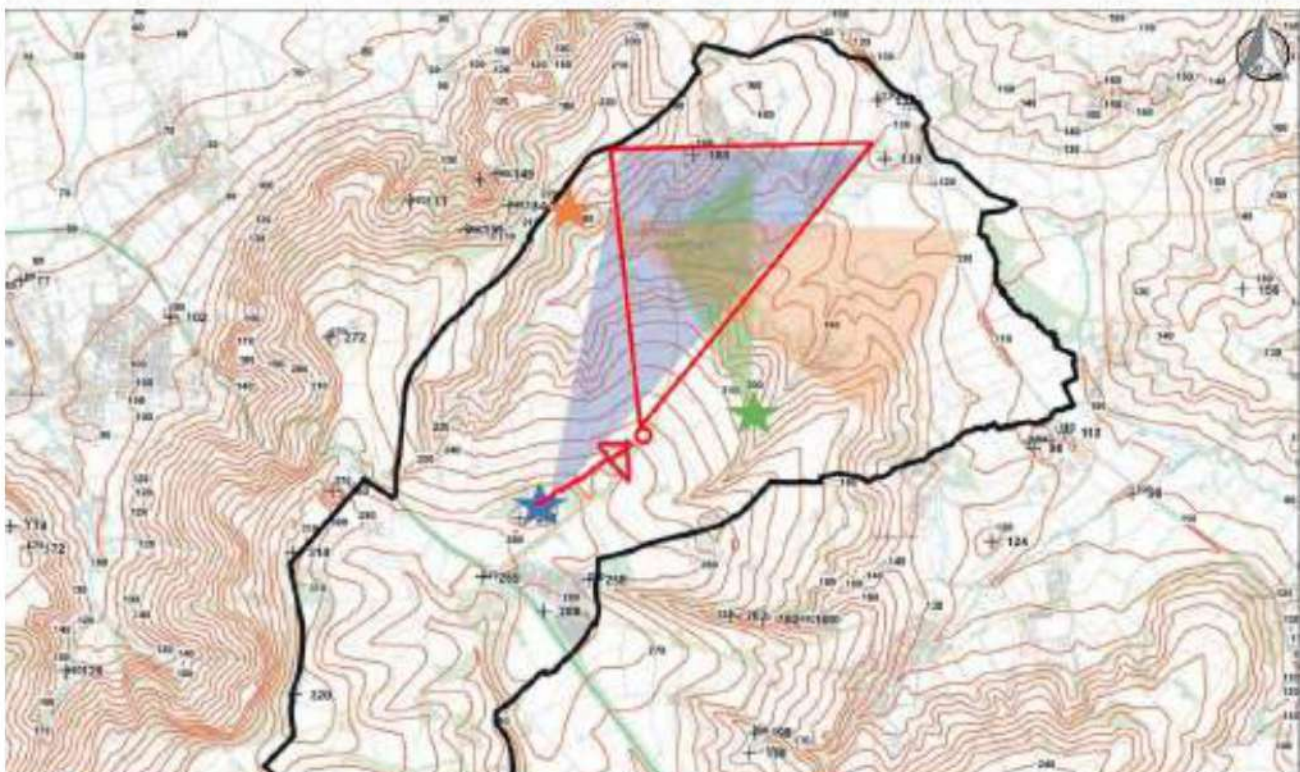


Figure 2 - Plan suggesting amendment to key view (Figure 5 in consultation document).

cover so there is no long distance view from this location. Rather, we advise that this key view is relocated to the entrance of Stanleys Quarry and Westington Hill where the view northwards opens up (see Figure 2).

With respect to ecology, it is noted that Westington Quarry forms part of a Nature Recovery Priority Area as identified at Figure 15 of the consultation document. A separate representation has been prepared by Carter Jonas on behalf of Campden Estate which responds to emerging Policy 5 that deals with the purpose of the proposed Nature Recovery Priority Areas and the delivery of Biodiversity Net Gain (BNG). Overall, the Campden Estate support the principle of recovering biodiverse areas and delivering BNG but suggest that this is worked through with Gloucestershire County Council who are the responsible authority for preparing the Nature Recovery Priority Areas within Chipping Campden and that further justification should be put forward to designate such areas within the Neighbourhood Plan process.

Conclusions

Overall, the site known as Westington Quarry should be allocated for a mixed-use development comprising a hotel (Use Class C1), a spa facility (Use Class E), an employment work hub and flexible office/workshop space (Use Class E) and live/work units (Sui Generis) within the forthcoming Neighbourhood Plan, or at least recognised as a site that can accommodate employment generating uses.

We would welcome a further conversation with the Neighbourhood Plan group if this would prove useful.

In the meantime, I trust this representation will be considered as the emerging Neighbourhood Plan progresses.

Yours Sincerely



Appendix 1 – Site location plan

Appendix 2 – Concept Document

FEBRUARY 2024

WESTINGTON HOSPITALITY & WORKPLACE

CAMPDEN

A VISION FOR WESTINGTON QUARRY

VISION DOCUMENT

PROJECT CAMPDEN



01 —
INTRODUCTION

1.1 - LOCATION

1.2 - QUARRY & ESTATE

1.3 - PUBLIC RIGHTS OF WAY

1.4 - SITE ANALYSIS

02 —
DESIGN DEVELOPMENT

2.1 - CONCEPT VISION

2.2 - LAYOUT OPTIONS

2.3 - LANDSCAPE CONCEPT

2.4 - ARCHITECTURAL CONCEPT

2.5 - HOTEL & SPA VISION

2.6 - PRECEDENTS: HOTEL

2.7 - PRECEDENTS: SPA

2.8 - PRECEDENTS: WORKPLACE

03 —
WOLDON PREVIOUS EXPERIENCE



The Campden Estate is defining a vision to breathe new life into the former quarry located on Westington Hill, above Chipping Campden. Proposals build on the industrial history of the site, producing a distinct vernacular architecture within a vision for a restored landscape.

The Estate's ambition is to transform this existing site of local employment through a development in which hospitality (hotel and spa) and workplace act in synergy to create a vibrant and sustainable destination.

The development will bolster the local industry for leisure and tourism, providing a sustainable hospitality offering that is rooted in the natural environment. In tandem, it will provide a destination for regenerative commerce through the provision of flexible workspace.

The proposal represents a unique opportunity to promote the rural economy within the district with a visionary, sustainable development through a celebration of natural, manmade and human capital.

The Campden Estate embodies a spirit of visionary optimism. We believe we can have a positive impact on society. Acting with courage and intent, this outlook enables us to see new possibilities in our own lives.



At the heart of the 1,700-acre Campden Estate lies Campden House, a Grade II* listed house dating from the early 17th century, situated beside a Grade II* Tithe Barn, further listed outbuildings and landscaped garden. The upkeep of these heritage assets presents a significant challenge, now with an expanding conservation deficit.

The Estate's development of Westington Quarry provides a unique opportunity to provide ongoing financial sustainability for the Estate, facilitating the longer term remedy of this conservation deficit.

The Campden Estate was purchased in 1972 by Philip Smith, son of William Henry Smith, 3rd Viscount Hambleden and chairman of W.H. Smith & Sons. Today the Estate is run by Lord Hambleden's grandson, Thomas Smith, co-founder of RIBA Chartered Practice Woldon Architects Ltd.

'Campden House has a chaste yet dignified manorial character ... a delightful surprise in this very hidden little valley.'
Jeremy Musson





The metropolis and the regions have long retained deep ties and dialogue in skills and thought, especially in the Cotswold Hills. A prime example of this is the Guild of Handicraft, led by architect C.R. Ashbee, which moved from London in 1902 to settle in Chipping Campden.

The output of the Guild and its influence within the Arts and Crafts Movement over the ensuing decades is well documented. This process of interaction between the metropolis and regions continues to this day.

The Campden Estate is developing a collaboration with one of the leading UK universities of the creative arts alongside one of the UK's leading creative branding agencies.

This collaboration will underpin the thinking and resources to be accessed in the workspace by existing firms wishing to rebrand for net zero alongside new brands founded on regenerative principles.

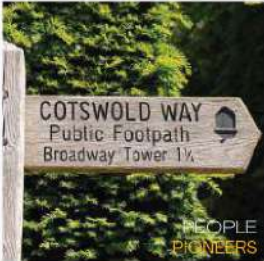


INTRODUCTION

1.1 LOCATION: NORTH COTSWOLDS

STRATFORD-UPON-AVON	~ 12 MILES
CHELTENHAM	~ 20 MILES
CIRENCESTER	~ 30 MILES
BIRMINGHAM	~ 37 MILES
OXFORD	~ 37 MILES
LONDON	~ 90 MILES

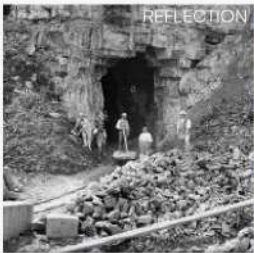
LOCATION: CHIPPING CAMPDEN



INTRODUCTION
1.2 LOCATION: CHIPPING CAMPDEN

Westington Quarry lies approximately 15 miles south of Chipping Campden, a short distance from the A44.

Quarrying activities, evident on a 1799 Enclosure map, have now ceased, with substantial former factory buildings and level paved yards remaining across a nine acre site directly accessed off the B4081.



WESTINGTON QUARRY: 1799 ENCLOSURE MAP



PROJECT CAMPDEN

INTRODUCTION
1.3 COTSWOLDS NATIONAL LANDSCAPE

With the site's proximity to Chipping Campden, there is direct access onto the Cotswold Line cycle route in addition to the Cotswold Way footpath, running the length of the Cotswolds National Landscape, and other Public Rights of Way.





 HIGHWAYS ACCESS
 ACCESS ON SITE

VISION DOCUMENT



WESTINGTON
INSPIRING REGENERATIVE COMMERCE

WE ARE DISCIPLINED AND DETERMINED
WE ACT WITH IDEALISM AND INSPIRATION
WE ARE SMALLER THAN OUR VISION





CONTINUOUS RENEWAL
OF THE HIGHEST STANDARDS

VISION DOCUMENT

PROJECT CAMPDEN

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EXTERIOR
ARCHITECTURE

CAMPDEN WOLDON



RE-WILDING AND REGENERATION

Revealing past years of history

- » Spaces to reflect & remember & learn.
- » Celebrate local biodiversity and planting. With a focus to re-wild to reference preindustrial times.

Views within and out of the site

- » Highlight key views with feature trees.
- » Frame and enhance views out to the wider site.
- » Celebrate rocky elements and mining topography with the landscape.
- » Opportunities to sit beside the water.
- » Opportunities to walk and explore the site.



CELEBRATE THE HISTORY OF THE AREA

Industry

- » Incorporate equipment and materials within the landscape.
- » Furniture and programme of spaces to provide a range of activities and functions.
- » Inherently playful landscape

Materiality

- » Reference to the mining industry through material choices such as site furnishings.



FUTURE-PROOFING

Area of Outstanding Natural Beauty

- » Align with the future plans of the wider Cotswolds AONB.
- » Meet the values, welcoming, expert, collaborative, creative, positive.

SUDs and Water Management

- » Site wide drainage strategy
- » Flood mitigation and alleviation

Oasis that connects People to Nature

- » Spaces to rest, grow, interact, work within the landscape
- » Future-proof buildings so they are adaptable to further energy efficiency measures

DESIGN DEVELOPMENT
2.2 LAYOUT OPTIONS

N

I



COMMERCIAL WORKSPACE



HOTEL & SPA



EDUCATIONAL



PARKING

OPTION 1



OPTION 2



OPTION 3







PROJECT CAMPDEN

CAMPDEN WOLDON

16

PROJECTING CHARISMA
AND ENERGY



A CENTRAL
PHILOSOPHY



A CONTINUAL
RENEWAL OF THE
HIGHEST STANDARDS

DRIVING STRATEGY
AND UNIQUE INSIGHTS



WHENEVER WE DO, IT IS WITH
IDEALISM AND INSPIRATION

- KEY:
- 1 - HOTEL WING
 - 2 - SPA AND LEISURE
 - 3 - MIXED USE BUILDING
 - 4 - ACCOMMODATION
 - 5 - NATURAL POOL
 - 6 - SAUNA HUTS

ENABLING US
TO SEE NEW POSSIBILITIES
IN OUR OWN LIVES

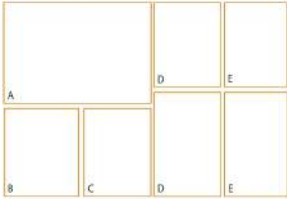




KEY:
A - HOTEL WING
B - HOTEL ENTRANCE AND LOUNGE
C - GREEN ROOF TERRACE WITH RESTAURANT
D - HOTEL SUITES
E - POND AND EXTENSIVE LANDSCAPE
F - SPA AND LEISURE



DESIGN DEVELOPMENT
2.6 PRECEDENTS: HOTEL



- A - CASA RURAL, RCR ARQUITECTES
- B - LONGROIVA'S HOTEL & THERMAL SPA, LUIS REBELO DE ANDRADE
- C - ENGLISH FARM CABIN, OUT OF THE VALLEY
- D - HOTEL HOSPEDES, EQUIP XAVIER CLARAMUNT
- E - THE ALICE HAWTHORN HOTEL ROOMS, DE MATOS RYAN

INSPIRING OUR
BETTER FUTURE

VISION DOCUMENT

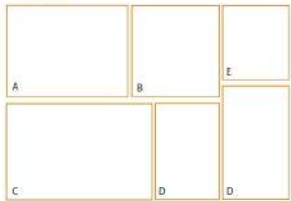


VISION DOCUMENT

PROJECT CAMPDEN

CAMPDEN WOLDON

DESIGN DEVELOPMENT
2.7 PRECEDENTS: SPA



- A - SOHO FARMHOUSE
- B - THYME
- C - ALFRISTON SWIMMING POOL
- D - MORRIS + COMPANY
- D - BEDRUTHAN HOTEL & SPA
- E - BLACKBIRD HOTEL, RDMA

INSPIRING OUR
BETTER FUTURE

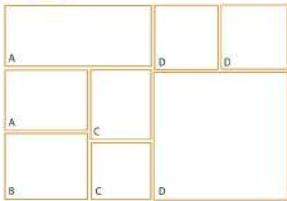
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PROJECT CAMPDEN

CAMPDEN WOLDON

DESIGN DEVELOPMENT
2.8 PRECEDENTS: WORKPLACE



- A - FARM EO, TIMOTHY TASKER ARCHITECTS
- B - HYDE HALL, CULLINAN STUDIO LTD
- C - ELKSTONE, BLAKE ARCHITECTS
- D - THE ALICE HAWTHORN HOTEL ROOMS, DE MATOS RYAN

INSPIRING OUR
BETTER FUTURE

VISION DOCUMENT



PROJECT CAMPDEN

CAMPDEN WOLDON

NEW HOUSE IN LISTED SETTING - 3 X RIBA AWARD WINNER 2018

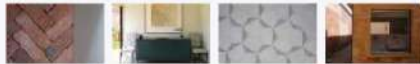
Nevill Holt, Leicestershire - RIBA Regional award winner, Conservation award winner and Project architect award winner.



A New House and Garden
Within the grounds of Grade I listed Nevill Holt lie three historic walled gardens dating from the seventeenth century. Recently restored kitchens and Italianate gardens are accompanied in the third enclosure by a new house designed by Woldon Architects.

Contemporary Response to Site and Materials
Replacing a tired 1960s bungalow, the new south-facing house takes on a symmetrical form, standing clear of the surrounding historic walls. The material palette draws inspiration from the main hall with a series of hand-crafted bronze roofs set on ironstone facades and framed by ponds. The stone is worked by hand and carefully selected from quarries and reclaimed sources.

High-Quality Low-energy Detailing
A fabric-first approach to construction and careful detailing set a high standard for the quality of the building work and finishes. Together with the use of an air source heat pump this provides a comfortable yet low-energy building.



VENUE BUILDING AT GRADE I LISTED COUNTRY HOUSE

Cheshire

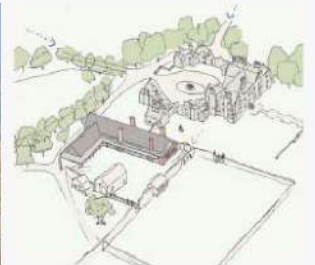


Masterplan and New Hospitality Building
Woldon developed an Estate masterplan & designs for a new 750sqm venue building on a former stable yard site beside a Grade I listed building. The venue building is to house a wedding business along with corporate and charity events.

Research and Analysis
The designs evolved from extensive historic analysis of the house & site to understand its evolution & character. Special emphasis was placed on use & flow around the house & grounds in order to inform the proposed masterplan, with consideration for pedestrians, traffic & servicing requirements.

Organisational Analysis and Technical Brief
The arrangement of existing programmes & strict operational requirements presented a number of limitations & opportunities for the design.

Site Information
A substantial amount of site information was gathered in order to manage risk and assist in the development of a robust construction cost budget for further design development.



WOLDON
3.0 PREVIOUS EXPERIENCE

JURASSIC COAST LEISURE DESTINATION
East Devon, AONB



Vision and Masterplan
Woldon have been appointed to devise a masterplan vision for the 22 acre site; creating a commercially sustainable future. Designs deliver significant benefits to the local residents, wider community and owners.

The existing site contains a number of outdated properties set in and around a cliff top landscape. The whole site sits within the East Devon Area of Outstanding Natural Beauty (AONB). The existing golf club facilities are under utilised and have limited local appeal. Uniquely the South west Coast path runs through the golf course and has untapped commercial potential to support business on site.

Capture the View
The proposals include exciting architectural and landscape design that capture the stunning views open the site to visitors. Public spaces welcome weary walkers with an inspiring place to refresh and dwell whilst offering alternative strolls into nature and sculpture trails.



VISION DOCUMENT

PROJECT CAMPDEN

HOTEL & HOSPITALITY
Berkshire



This project brings back to life a coaching inn that had been closed for a number of years. Working with Oakman Inns to produce a quadrangle of buildings, knitting two new hotel wings into the existing buildings, with the need to make a compact statement on this site within the Greenbelt on the outskirts of Ascot.

The new buildings use a cross laminated timber (CLT) structure and a simple palette of materials - white brickwork, black timber, zinc roof - to bring a modern and high quality dimension to the whole and complement the language of the existing inn.



CAMPDEN WOLDON

WESTINGTON

Appendix 2 – Previous representation responding to draft Policy 5 (Regulation 14 consultation)

Representations to the Chipping Campden Neighbourhood Plan

Regulation 14 Consultation

1 Introduction

- 1.1 The following representation is submitted on behalf of the Campden House Estate ('the Estate') which extends to 677 hectares. The Estate lies wholly within the administrative area of Cotswold District Council and four parishes (Chipping Campden, Weston-Subedge, Willersey and Saintbury). Mr Thomas Smith is the owner and resides on the Estate.
- 1.2 The Estate commends the work that has been undertaken by the team preparing the Chipping Campden Neighbourhood Development Plan 2023-2031 (CCNDP) and in general are supportive of its contents. In particular, the Estate supports the recovery of biodiverse areas and BNG as a principle.
- 1.3 However, they are concerned by and object to the scope of Policy 5 and associated Figure 15 (page 74) and Table 7 (page 76), Key Diagram (page 10), Appendix 2: Natural Environment (page 88, 89 and 91), Appendix 7: Local Nature Recovery Areas (11 The Gate House/B4081/Westington Quarry (page 129) and 12 Hare Park Plantation (page 130)).

2 Local Nature Recovery Strategies (LNRS)

- 2.1 It is not clear from the map at Figure 15 (page 74) and Appendix 2 (2 River Cam and Campden Wood (page 125), 3a Leasows Farm (page 125) and 11 The Gate House/B4081/Westington Quarry (page 129)) whether the areas identified are of existing ecological value or are areas identified to provide green corridors between areas of ecological value.
- 2.2 The first paragraph on page 73 of the CCNDP states, "*the CCNDP is setting out a local land use strategy for inclusion in the wider LNR strategy when that is prepared.*" The Estate is concerned by this approach especially when read in conjunction with page 75 of the CCNDP as it conflates the purposes of local nature recovery strategies (LNRS) and development plan documents.
- 2.3 In the first paragraph on page 75 of the CCNDP it states, "*It is therefore appropriate and possible for the CCNDP to indicate where biodiversity net gain and habitat improvement could be directed*". The CCNDP goes on to state in the second paragraph on page 75 that, "*DEFRA guidance states that the priorities identified by every local nature recovery strategy should reflect local circumstances, including the most important issues to local people and organisations. The CCNDP is therefore setting out local priorities to assist in the preparation of the wider LNR strategy.*" However, we contend for the reasons explained in the following paragraphs that the CCNDP is not the appropriate document for identifying sites for Local Nature Recovery Strategies or 'receptor' sites for Biodiversity Net Gain.
- 2.4 Section 104 of the Environment Act 2021 sets out the requirement for LNRS to cover the whole of England. DEFRA has identified 50 strategy areas where a LNRS is required and have allocated Gloucestershire County Council (GCC) as the responsible authority¹ for preparing the LNRS in the area that includes the parish of Chipping Campden. National guidance is contained in the Local Nature Recovery Strategy Statutory Guidance, DEFRA March 2023.
- 2.5 Page 9 of the CCNDP identifies in summary form those groups that the team behind the preparation of CCNDP has consulted. It includes, "*Meetings with various local landowners 30.8.2014-22.9.2015*", however the Estate is not aware of engagement from the CCNDP team that identified land within the Estate for inclusion in the LNRS.
- 2.6 Paragraph 89 of the 2023 DEFRA guidance states, "*If the responsible authority knows that a landowner opposes a potential measure on their land and is very unlikely to choose to carry it out, it would be better to explore alternatives or include other more suitable measures before public consultation. This is particularly important if they propose a location due to its potential to join up areas of habitat to create a wider network. If objections from landowners only become clear at public consultation, the responsible authority should try to accommodate their views where this does not undermine the coherence and ambition of the strategy as a whole.*"

¹ Appointed by the Secretary of State to oversee the preparation of the LNRS in an area as set out by Section 105 of the Environment Act 2021.

- 2.7 Until GCC as the responsible authority for the LNRS has engaged with the Estate we are unable to assess the implications of being identified within a LNRS. Therefore, we object to the inclusion of the Estate's land in the LNRS.
- 2.8 Additionally, the Estate is concerned by what appears to be an imposed merging of the roles of the LNRS and the market for BNG units, without meaningful engagement with and commitment from the land managers whose land has been identified in Figure 15 (page 74) and Table 7 (page 76), Key Diagram (page 10), Appendix 2: Natural Environment (pages 88, 89 and 91), Appendix 7: Local Nature Recovery Areas (2 River Cam and Campden Wood (page 125), 3a Leasows Farm (page 125) and 11 The Gate House/B4081/Westington Quarry (page 129)) of the CCNDP.
- 3 **Biodiversity Net Gain (BNG)**
- 3.1 Separate from the LNRS, biodiversity net gain (BNG) is required under a statutory framework introduced by Schedule 7A of the Town and Country Planning Act 1990 (inserted by the Environment Act 2021). It is recognised that the CCNDP was drafted prior to the Department for Levelling Up, Housing and Communities (DLUHC) publishing a new Planning Practice Guidance (PPG) section on how councils and developers can demonstrate BNG (<https://www.gov.uk/guidance/biodiversity-net-gain>). The PPG section on BNG was published on 14 February 2024 with the latest of subsequent updates dated 1 May 2024.
- 3.2 Except for certain categories of development, developers must deliver 10% BNG in respect of their development sites. If developers cannot achieve BNG on their own sites, they will have to make off-site gains by using off-site biodiversity units; thus, creating a market in BNG units. As a 'land manager' defined by the guidance, the Estate can choose whether to identify areas of land for the purpose of BNG and to sell BNG units to developers. In order to sell BNG units, there are several steps that land managers need to abide by. One of these steps is to register the BNG units as a biodiversity gain site on a public national biodiversity gain sites register. Selling in the BNG market is a choice for land managers and needs to be considered alongside the wider objectives and operational requirements of the estate. Therefore, the Estate considers it misleading for the CCNDP to identify 'nature recovery priority areas' and refer to them in the way it has on pages 73 and 75, Table 7 and Appendix 2 and Appendix 7.
- 3.3 In the final paragraph on page 75 of the CCNDP it states, "*It is expected that as the Environment Act legislation evolves, funding for nature improvements will become available through a range of sources such as the Gloucestershire Nature and Climate Fund², agri-environment schemes or through the delivery of biodiversity net gain through the planning system. The latter would also include off-site biodiversity net gains contributions, probably managed through the Nature and Climate Fund.*" It appears from the Gloucestershire Nature and Climate Fund (GNCF) website that it is a not-for-profit organisation established to support landowners, developers and local planning authorities through the biodiversity net gain process. However, this is only one of the three types of options available to land managers to sell BNG units. The Estate is concerned by the influence the CCNDP will have as a statutory development plan document in the market for BNG units. Additionally, developers requiring off-site BNG units would, with reference to Figure 15 of the CCNDP, expect to find the corresponding sites on the national biodiversity gain sites register.
- 3.4 Before land managers can register a gain site, they must have a legal agreement. This could be a planning obligation with a local authority or a conservation covenant with a responsible body. The legal agreement must secure habitat enhancement and maintenance for at least 30 years. It details the habitat works being committed to and the outcomes to be achieved. The procedures and processes governing BNG are complex and whilst the sentiment to improve ecological outcomes by those behind the CCNDP should be commended, including BNG in the CCNDP is unnecessary and inserts confusion for landowners and developers.
- 3.5 The third paragraph on page 75 of the CCNDP states, "*Figure 15 and the more detailed evidence in Appendix 2 and Appendix 7 shows that there are already existing habitats that could benefit from protection and improvement, marked 1-13. Table 7 indicates how biodiversity gain and habitat improvement could be achieved in each area.*" However, Appendix 2 (page 91) does not provide detail of the "rare and protected species locations" ie what the rare/protected species are. It is also noted that the data is from July 2017. The Chartered Institute of Ecology and Environmental Management (CIEEM) Advice Note on the Lifespan of Ecological Reports and Surveys, 2019 advises that data that is more than three years old is unlikely to still be valid and most, if not all, of the surveys are likely to need to be updated. The Key on the map on page 89 of the CCNDP is confusing in its reference to "Chipping Campden NDP – Green Space Habitat Features" and "Appendix 8: Local Green Spaces".

² GNCF – Gloucestershire Nature + Climate Fund (www.glosncf.com)

To avoid confusion, we suggest that the description on the Key and the layer on the map at page 89 are deleted.

- 3.6 It is clear from the Environment Act 2021, the Town & Country Planning Act 1990 and associated regulations and guidance that it is not appropriate for neighbourhood plans to include strategic land use strategy or policies. BNG is strategic policy.

4 Amendments

- 3.7 The Estate considers that the following suggested amendments will assist in moving forward to submission and examination of the CCNDP. The Estate supports the recovery of biodiverse areas and BNG as a principle, but suggests that this is worked through with GCC and that further justification is provided as to why these areas have been deemed suitable as LNRs.
- 3.8 Delete the last sentence of the first paragraph and the first and last sentences of the last paragraph on page 73:
~~"In this case, the CCNDP is setting out a local land use strategy for inclusion in the wider LNR strategy when that is prepared."
"The strategy area is the neighbourhood area."
"Figure 15 shows potential areas of importance."~~
- 3.9 Amend the second sentence of the last paragraph on page 73 as follows:
~~"Appendix 7 2 provides detailed habitat maps"~~
- 3.10 Delete land within the Estate from areas 2, 3a and 11 on Figure 15 (page 74), Table 7 and Appendix 7 (detail 2 and 3a on page 125 and detail 11 on page 129) and the Key Diagram (page 10).
- 3.11 Delete the last sentence of the first paragraph on page 75:
~~"It is therefore appropriate and possible for the CCNDP to indicate where biodiversity net gain and habitat improvement could be directed to be finally determined at the planning application stage, when details of a specific proposal can be fully explored."~~
- 3.12 Delete the last sentence of the second paragraph on page 75:
~~"The CCNDP is therefore setting out local priorities to assist in the preparation of the wider LNR strategy."~~
- 3.13 Delete the penultimate and last sentences from the last paragraph on page 75:
~~"It is expected that as the Environment Act legislation evolves, funding for nature improvements will become available through a range of sources such as the Gloucestershire Nature and Climate Fund, agri-environment schemes or through the delivery of biodiversity net gain through the planning system. The latter would also include off-site biodiversity net gain contributions, probably managed through the Nature and Climate Fund."~~
- 3.14 Delete Policy 5 in its entirety.
- 3.15 If Chipping Campden Town Council wishes to put forward the areas identified in Figure 15 and Appendix 7 to GCC, there is a separate process for doing so.
- 3.16 Delete "Chipping Campden NDP – Green Space Habitat features" on the Key and the layer on the map at page 89 (part of Appendix 2).
- 3.17 Number the red star symbols on the map at page 91 (part of Appendix 2) and provide table listing the protected species associated with each red star. If no supporting information as to the precise location, the associated species and manner in which the evidence was obtained can be proved then we request that the red star symbols be removed as it would not be appropriate to retain them under such circumstances.

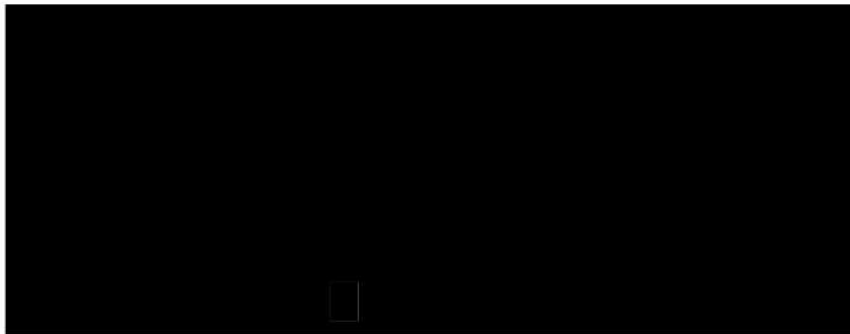
Rep #20 - Resident

How to use this form

Please complete Part A in full, in order for your representation to be taken into account at the Neighbourhood Plan examination.

Please complete Part B, identifying which paragraph your comment relates to. Repeat this for subsequent comments relating to other sections of the plan.

Part A

A large black rectangular box redacting the content of Part A. A small white square is visible near the bottom center of the redacted area.

Organisation and position (if applicable):

Date: 13th August 2025

Do you wish to be notified of the Local Planning Authority's Decision to 'make' (adopt) the Plan, under Regulation 19 of the Neighbourhood Planning (General) Regulations 2012

Please delete as applicable: YES

Part B

Which part of the document does your representation relate to? Annex A Reg15 Draft CCNDP 040325

Paragraph number: Section 4 Community Concerns and Aspirations - Pages 41/45

Policy reference:

Do you support, oppose, or wish to comment on this paragraph? (Please tick)

Support ☒ Support with modifications ☐ Oppose ☒ Have comment ☐

Please give details of your reasons for support or opposition or make comments:

- I support the points raised in the community concerns. However heavy goods vehicle traffic is not just a through traffic issue in the town. HGV traffic has a massive detrimental effect to the community on the outskirts of the town, namely Station Road and Castle Gardens, which I feel has been largely ignored by the town council. Therefore, I support a comprehensive review of the HGV routes and traffic management improvements which at least for HGV should be more than just signage (which is ignored by HGV's). We could be more ambitious and consider a new road linking the Bratches development and the Campden Business Park. This could help keep HGV's out of the town centre and provide another route for school parking traffic, new health centre and indoor sports centre, and alleviate and issues around the Arms houses and Cidermill lane.
- A new railway station would be a significant asset to the town, not just for residents and tourists but also the workforce at the Campden Business Park and Campden BRI.
- I support the creation of new public parking for the town, but the development of the health centre, primary school and leisure centre should provide adequate parking (with provision for growth). I would also submit that any new infrastructure should also support the provision of sustainable energy generation such as solar panels on the car park. It can be sympathetically designed to fit in with the environment, and could provide lower energy costs for the new facilities. Also, the new infrastructure should provide the opportunity to install electric charging points for cars. My final point on this section is the need to provide proper secure facilities for bike storage in all of the parking areas in the town. The more facilities we have to reduce car traffic the better.
- The current doctors surgery is in dire straits and the need to create a comprehensive medical centre should be a priority. The opportunity exists to create in a new medical centre, diagnostic facilities that can benefit not only the local community but also the wider north Cotswold area, an example of this Stowe surgery that has ultrasound diagnostic facility.

- The Indoor leisure centre is an excellent ambition with I would support, with the proviso that any facilities factor in the demographics of the community (average age 51). For example, indoor facilities could include several Pickleball Courts a sport is known for its inclusivity, with players of all ages and fitness levels participating together. The average age of pickleball players in the UK is 50+ , and a 52:48 split between men and women. To have a viable leisure centre there is a need to ensure it's used fully during the day, which means catering for 'time rich' members of the community. I am sure there would be an opportunity for public/private funding for an Indoor centre given the massive push to increase health and mental fitness in communities such as Chipping Campden.

What improvements or modifications would you suggest?

Please make sure any additional pages are clearly labelled



Chipping Campden Neighbourhood Development Plan: pre-examination consultation

Regulation 16 Consultation

Neighbourhood Planning Regulations 2012

Chipping Campden Town Council has submitted a Neighbourhood Development Plan. The Plan sets out a vision for the parish of Chipping Campden, covering both the town and Broad Campden and presents planning policies which they propose be used to determine planning applications locally.

The Neighbourhood Plan and supporting documents are available to view on our website.

All comments must be received by 12 noon on **15th August 2025**. There are a number of ways to make your comments:

Complete an [electronic response form](#)

Complete **this word version** below and email it to: neighbourhood.planning@cotswold.gov.uk

Print the form and post it to: Neighbourhood Planning, Cotswold District Council, Trinity Road, Cirencester, GL7 1PX.

We will accept other comments in writing (including electronic, such as e-mail, provided that a name and address is supplied. We cannot accept anonymous comments.

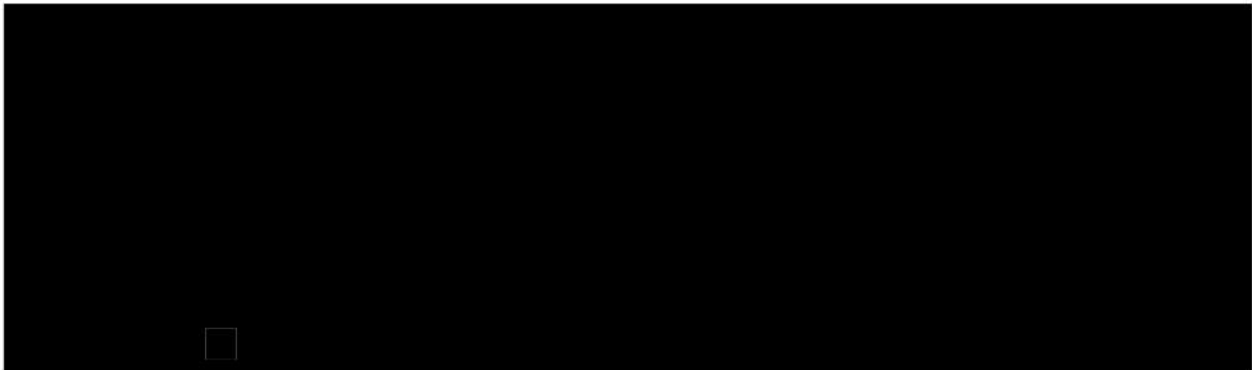
All representations will be publicly available, and identifiable by name and (where applicable) organisation. Please note that your comments, name and address and, if applicable, organisation will be publicly available but your signature, email address and telephone number will be removed. Other personal information provided will be processed by Cotswold District Council in line with Data Protection legislation. To find out how we use your personal data, please view our [privacy notice](#). Representations may include a request to be notified of the local planning authority's decision to make the plan under Regulation 19.

How to use this form

Please complete Part A in full, in order for your representation to be taken into account at the Neighbourhood Plan examination.

Please complete Part B, identifying which paragraph your comment relates to. Repeat this for subsequent comments relating to other sections of the plan.

Part A

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Organisation and position (if applicable): Brodie Planning Associates - Director

Date: 12 August 2025

Do you wish to be notified of the Local Planning Authority's Decision to 'make' (adopt) the Plan, under Regulation 19 of the Neighbourhood Planning (General) Regulations 2012

Please delete as applicable: YES

Part B

Which part of the document does your representation relate to?

Paragraph number: n/a

Policy reference: Policy 6: Local Green Spaces (draft LGS shown at Figure 17)

Do you support, oppose, or wish to comment on this paragraph? (Please tick)

Support ☐ Support with modifications ☐ **OPPOSE X** Have comment ☐

Please give details of your reasons for support or opposition or make comments:

I write on behalf of the landowners in **OBJECTION** to **draft LGS designations reference LGS19 and LGS22.**

Each land parcels as shown in Figure 17 of Policy 6 are discussed in turn below:

LGS19 – The Hoo West

Firstly, I need to draw the examiners attention to the fact that the landowners have not been advised or consulted in respect of draft LGS designation ref LGS19. The Consultation Statement submitted as part of the Regulation 15 submission includes representations received as part of the Regulation 14 consultation. A representation made by Morgan Elliot Planning on behalf of Mr McKenzie in regard to draft designation ref LGS20 The Hoo East (now referenced as LGS 19 The Hoo East in the Reg 16 consultation) clearly states as shown under *Question 7 – Policy 6 (Local Green Spaces)* (page 55) that “With regard to LGS20 The Hoo East, the ownership details regarding the site are incorrect and Mr McKenzie does not own the full extent of the site.” The response provided by the NDP steering group makes no mention of this statement and no attempt has been made to contact the actual landowner, nor communication received to correct this error as clearly pointed out in above-referenced Reg 14 representation. This has prejudiced the landowner.

Secondly, I draw to the attention of the examiner that an outline planning application on part of the land identified as draft LGS19 is currently being considered by the local planning authority under reference 25/01194/OUT (Land Parcel North Of Olimpik Drive Chipping Campden) for the erection of 30 new houses; 40% of which are affordable homes.

Paragraph 107 of the NPPF (December 2024) sets criteria for the designation of Local Green Space which states “designation should only be used where the green space is:

- a) in reasonably close proximity to the community it serves;
- b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and
- c) local in character and is not an extensive tract of land.”

Contrary to the views expressed in the LGS assessment (Appendix 6, Reg 15 version CCNDP), draft designation LGS 19 does not meet the criteria set out under Paragraph 107. As such, the designation of this land as LGS would be contrary to national planning policy.

In regard to being demonstrably special or holding particular local significance, the land identified as LGS19 forms part of the open countryside that surrounds the market town of Chipping Campden; a network of agricultural fields. This wider surrounding landscape is already protected for its scenic beauty through designation as a Natural Landscape (the Cotswolds National Landscape) (formerly AONB). The settlement of Chipping Campden and surrounding countryside is washed over by this national designation. The importance of this land as local green space has been overstated in my opinion in an attempt to block areas considered under threat from future development. This restrictive (rather than positive) planning strategy is wholly inappropriate and contrary to local strategic policies for growth and national planning policy. In particular paragraph 106 of the NPPF which states that “Designating land as Local Green Space should be consistent with the local planning of sustainable development and complement investment in sufficient homes jobs and other essential services”.

A restrictive rather than positive approach is further evidenced by the lack of any housing policy/policies in the draft Plan. The lack of housing policy fails to recognise the national housing crisis and the Government's intention to significantly boost the supply of new homes. This is particularly pertinent in the Cotswold District who have a significant shortfall in housing land supply, currently only able to demonstrate 1.1 years supply and woeful unmet affordable housing need. Chipping Campden is identified in the adopted Local Plan as a 'Principal Settlement' (Local Plan Policy DSI) wherein the growth of new housing and employment land will be focused. This failure to address the matter of housing places sole reliance on strategic policies to meet housing need up until 2031. Information gathered from consultation highlights 'housing' as a key issue for local people. Therefore, it is reasonable to state that the approach taken in the draft Plan to housing (or rather lack of) is not in general conformity with strategic policies, the NPPF nor

reflects the views of residents. A NDP should be an evidence-based document which it fails to be in regard to housing.

LGS22 – The Craves

Paragraph 107 of the NPPF (December 2024) sets criteria for the designation of Local Green Space which states “designation should only be used where the green space is:

- a) in reasonably close proximity to the community it serves;
- b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and
- c) local in character and is not an extensive tract of land.”

Contrary to the views expressed in the LGS assessment (Appendix 6, Reg 15 version CCNDP), draft designation LGS22 does not meet the criteria set out under Paragraph 107. As such, the designation of this land as LGS would be contrary to national planning policy.

It is accepted that a footpath crosses the field (Footpath 15) and there are two headland footpaths that run partially along the northern (Footpath 14) and southern (Footpath 16) boundaries, but this is not reason enough for this land to be of particular importance or demonstrably special. The NPPG is clear that “Areas that may be considered for designation as Local Green Space may be crossed by public rights of way. There is no need to designate linear corridors as Local Green Space simply to protect rights of way, which are already protected under other legislation.” (Paragraph: 018 Reference ID: 37-018-20140306: Revision date: 06 03 2014).

In addition, the NPPG states “There are no hard and fast rules about how big a Local Green Space can be because places are different, and a degree of judgment will inevitably be needed. The total area of the field known as the Craves amounts to 7 acres. When considered against the immediate local context this amounts to an area of considerable size, a large area or extensive tract of land which would fail to comply with the designation criteria set out in Paragraph 107 of the NPPF. Although this land lies within the form of the settlement and not adjacent to the settlement where a LGS designation might be likened to a ‘back door’ way to try to achieve what would amount to a new area of Green Belt by another name.’ [Paragraph: 015 Reference ID: 37-015-20140306; Revision date: 06 03 2014]. Equally, a blanket designation of the land known as the

Craves would not be consistent with or appropriate as a 'back door' approach to protect this land from future development or as a strategic gap by any other name.

Housing: the national shortage and local shortfall

A policy or policies on the supply of housing is lacking and should be included. Whilst there is no requirement for a NDP to contain policies on housing it is ill-advised for the draft Plan to be silent on this matter for the following reasons:

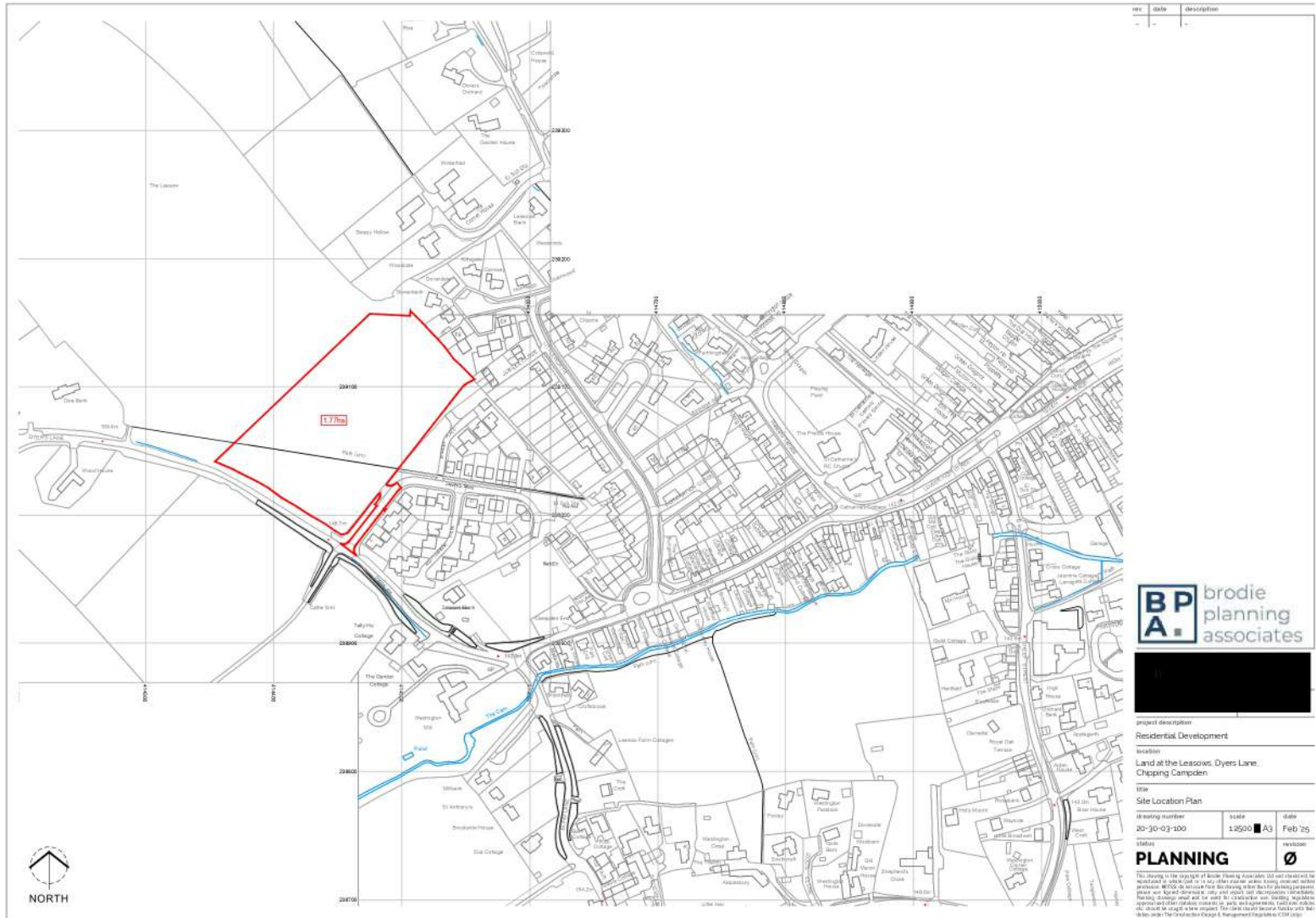
It is evidently clear from the engagement/consultation that has taken place, that local people want to influence the type and location of new housing. Many local families and young (economically active) people cannot stay in or move to the area because property prices are unaffordable, and the range of existing housing type acts perpetuates this issue. This is evident by an ageing population above the national average and a woeful unmet affordable housing need. Chipping Campden's is essentially becoming a retirement settlement. This is directly contrary to the Vision of the NDP which seeks *to maintain a vibrant community to realise the potential of our young people, to develop our businesses, and to provide financially rewarding work and fulfilling activities for all our residents...* and fails to fulfil the objective identified in the draft Plan *To ensure that the community has an appropriate range and supply of housing to meet its needs, including affordable and social housing developed in sympathy with the existing townscape and surrounding countryside.* Moreover, the lack of any housing policy is contrary to local strategic and national planning policy.

The lack of housing policy fails to recognise the national housing crisis and the Government's intention to significantly boost the supply of new homes. This is particularly pertinent in the Cotswold District who have a significant shortfall in housing land supply, currently only able to demonstrate 1.1 years supply and woeful unmet affordable housing need. Chipping Campden is identified in the adopted Local Plan as a 'Principal Settlement' (Local Plan Policy DS1) wherein the growth of new housing and employment land will be focused. This failure to address the matter of housing places sole reliance on strategic policies to meet housing need up until 2031. Information gathered from consultation highlights 'housing' as a key issue for local people. Therefore, it is reasonable to state that the approach taken in the draft Plan to housing (or rather

lack of) is not in general conformity with strategic policies, the NPPF nor reflects the views of residents. A NDP should be an evidence-based document which it fails to be in regard to housing.

Suggested improvements or modifications

1. Modify draft Plan to omit the draft LGS19 designation. Or should the examiner consider otherwise, omit land immediately adjacent to the settlement known as Land Parcel North Of Olimpick Drive Chipping Campden subject to application reference 25/01194/OUT. The submitted site location plan (drg. no. 2030-03-100) is enclosed for the examiner's attention.
2. Modify draft Plan to omit the draft LGS22 designation.
3. Include policy/policies on housing.



rev	date	description
-	-	-



project description
Residential Development

location
Land at the Leasow, Dyers Lane,
Chipping Campden

title
Site Location Plan

drawing number 20-30-03-100	scale 1:2500 A3	date Feb '25
version 01		revision 0

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Chipping Campden Neighbourhood Development Plan: pre-examination consultation

Regulation 16 Consultation

Neighbourhood Planning Regulations 2012

Chipping Campden Town Council has submitted a Neighbourhood Development Plan. The Plan sets out a vision for the parish of Chipping Campden, covering both the town and Broad Campden and presents planning policies which they propose be used to determine planning applications locally.

The Neighbourhood Plan and supporting documents are available to view on our website.

All comments must be received by 12 noon on **15th August 2025**. There are a number of ways to make your comments:

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Complete **this word version** below and email it to: neighbourhood.planning@cotswold.gov.uk

Print the form and post it to: Neighbourhood Planning, Cotswold District Council, Trinity Road, Cirencester, GL7 1PX.

We will accept other comments in writing (including electronic, such as e-mail, provided that a name and address is supplied. We cannot accept anonymous comments.

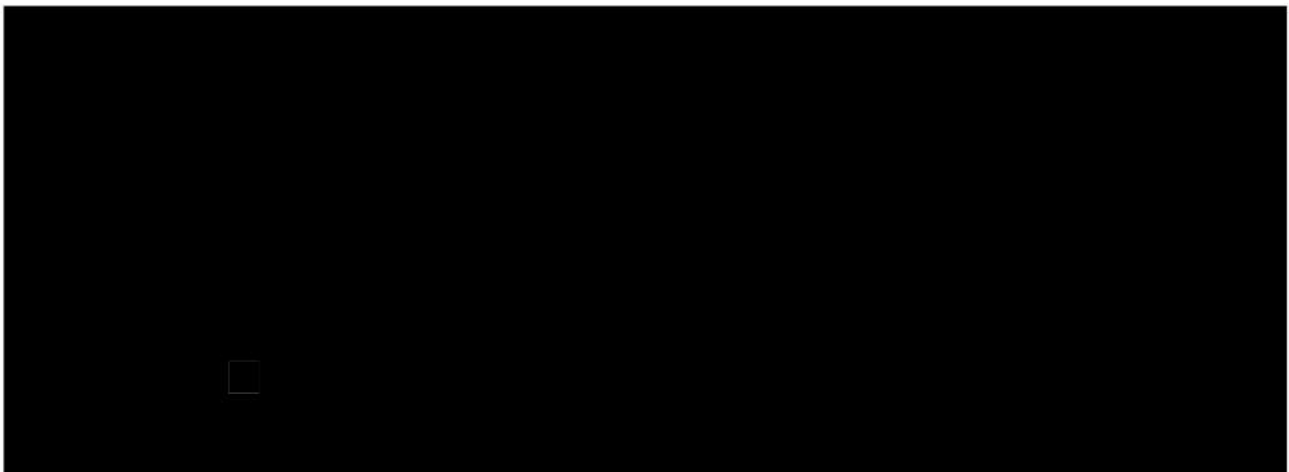
All representations will be publicly available, and identifiable by name and (where applicable) organisation. Please note that your comments, name and address and, if applicable, organisation will be publicly available but your signature, email address and telephone number will be removed. Other personal information provided will be processed by Cotswold District Council in line with Data Protection legislation. To find out how we use your personal data, please view our [privacy notice](#). Representations may include a request to be notified of the local planning authority's decision to make the plan under Regulation 19.

How to use this form

Please complete Part A in full, in order for your representation to be taken into account at the Neighbourhood Plan examination.

Please complete Part B, identifying which paragraph your comment relates to. Repeat this for subsequent comments relating to other sections of the plan.

Part A

A large black rectangular area representing a redacted form section. In the lower-left corner of this area, there is a small, faint white square.

Date: **TBC**

Do you wish to be notified of the Local Planning Authority's Decision to 'make' (adopt) the Plan, under Regulation 19 of the Neighbourhood Planning (General) Regulations 2012

Please delete as applicable: **YES**

Part B

Which part of the document does your representation relate to?

Paragraph number: **Figure 9 – Town Centre boundary**

Policy reference: **Policy 1**

Do you support, oppose, or wish to comment on this paragraph? (Please tick)

Support with modifications

Please give details of your reasons for support or opposition or make comments:

The proposed Town Centre Boundary excludes the former Cutts garage building. There is no justification for this exclusion, and it should be reinstated to reflect the Town Centre Boundary in the adopted Local Plan and the proposed redevelopment of the site for retail purposes.

Attached to this representation is a location plan showing the former Cutts garage building with associated parking areas, drawing reference 2692 SK63A. The site operated a Ford Dealership (sales, service / repair and bodywork) for 101 years until 2022, providing employment for many people. The site has been unused since 2022, although one of the outbuildings has been converted to a Post Office under application reference 22/01771/FUL.

The adopted Local Plan provides a Town Centre Boundary for Chipping Campden. The boundary includes the whole of the former Cutts Garage site, as depicted by the red line on the map below:



extract from the Cotswold District Local Plan Interactive Proposals Map

The Neighbourhood Plan proposes to modify the Town Centre Boundary, removing the site of the garage building whilst maintaining the inclusion of the two areas of car park to either side, such that the Town Centre Boundary will match more closely the Conservation Area boundary (the blue line on the plan above).

There is no reference or explanation in the Neighbourhood Plan as to why the Cutts garage building is to be excluded from the long established town centre boundary. The exclusion does, however, continue from previous consultation drafts of the Plan. Respondents to those documents asked why the land was excluded, with the Campden Society saying it is incoherent to include the two separate parts of the Cutts yard but exclude the building, and one respondent suggesting the site would be a good location for a Co-op with parking. The Neighbourhood Plan team commented only that:

'further extension to include Cutts Yard is not included because there is insufficient justification'

and

'town centre boundary not changed further because there is insufficient justification'

These responses make little sense given that the site already lies within the Town Centre Boundary (in the adopted Local Plan). It's continued inclusion would not be a 'further extension', merely the retention of the status quo.

Section 7 of the National Planning Policy Framework (2024) is titled 'ensuring the vitality of town centres'. It requires authorities to set a settlement hierarchy, and to identify town centres. Paragraph 90 of the Framework states that a positive approach should be taken to the growth, management and adaptation of town centres, allowing them to grow and diversify in a way which can respond to rapid changes in the retail and leisure industries, meeting the anticipated needs for a range of town centre uses including retail over a 10 year period. It also notes that town centre boundaries should be kept under review.

Policy EC7 of the adopted Cotswold District Local Plan accords with this guidance, setting out the retail strategy for the District, and confirming that the Council will support proposals which maintain and enhance retail provision and the wider health of the centre. It sets a retail hierarchy, with Chipping Campden identified as a 'Key Centre', with development supported within the defined centre. Policy EC8 continues that the preferred sequence of locations for main town centre uses in Principal Settlements is centre – edge of centre – out

of centre. The policy continues that only where there are no suitable sites available within the centre should other locations be considered.

Chipping Campden is an important settlement, second in the town centre hierarchy only to Cirencester. The District Council considered carefully the extent of the Town Centre Boundary when preparing the now adopted Local Plan, presumably concluding that the use of the site as a car sales business was a suitable town centre use, generating employment and enhancing the vitality and viability of the town centre.

Given the Framework requirements above, the Neighbourhood Plan is an appropriate place to reconsider the extent of boundaries, based on a current assessment of uses,. However it must consider the future viability of the town centre as well as the current extent of uses, and allow for new development to ensure that viability is maintained and enhanced. It must not change boundaries without justification. There is no justification for the exclusion of the Cutts site.

The Neighbourhood Plan team indicate there was 'insufficient justification' to include the garage site within the Town Centre Boundary. This is an inaccurate approach. The starting point should be its continued inclusion, as a vacant site, unless there is reason to remove it.

In this case, the owner of the Cutts Garage site is now [REDACTED] [REDACTED] who is proposing the construction of a new retail store [REDACTED]. A formal request for pre application advice was submitted to the District Council in 2020 (reference 20/02153/PAYPRE), proposing a supermarket and three holiday cottages. A public consultation event was held in November 2024, advertised in the Campden Bulletin and attracting around 150 people. A planning application has now been submitted to the District Council for a supermarket and three dwellings, Planning Portal reference PP-14167317. Attached to this document is the proposed site plan, reference 2692-050B. Other documents are available upon request or will be available for download from the District Council's website once the application is validated.

This provides clear evidence that it is appropriate for the site to remain within the Town Centre Boundary, providing the opportunity for the enhancement of the town.

It is noted that the pre-application response supported the principle of a supermarket on the site. There have been no substantive changes in policy since the pre-application response was received and thus no reason to consider the principle will now be found unacceptable. At the public consultation event the prospect of a new supermarket was well received.

Chipping Campden currently only has convenience store provision, with no supermarket, and the draft Neighbourhood Plan acknowledges that most people only use the town for 'top up' grocery shopping, relying on their cars to travel to larger settlements (mostly Evesham or Stratford upon Avon) for heavier weekly shopping.

Policy 1 includes objectives to protect and develop the town's economy, to strengthen the vitality and viability of the town centre by protecting and enhancing the range of retail available, and to improve facilities for car parking. The redevelopment of the Cutts site as proposed will meet all three of these objectives, providing additional parking, and a new retail store to reduce the need for residents to travel to other centres for larger shops. This benefits not only the vitality and viability of the town centre, but also the sustainability of the settlement.

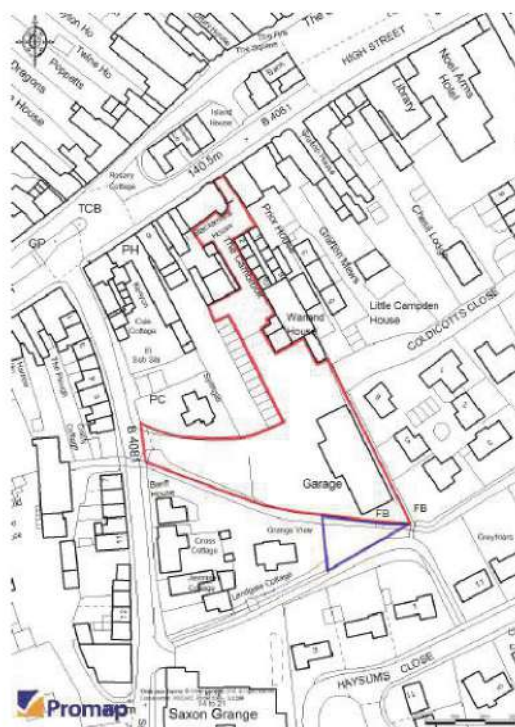
In light of this assessment, the Town Centre Boundary shown in the adopted Local Plan should be reinstated to include the Cutts site to ensure its future retail redevelopment.

Enc Location Plan reference 2692 SK63A
 Proposed Site Plan reference 2692-050B

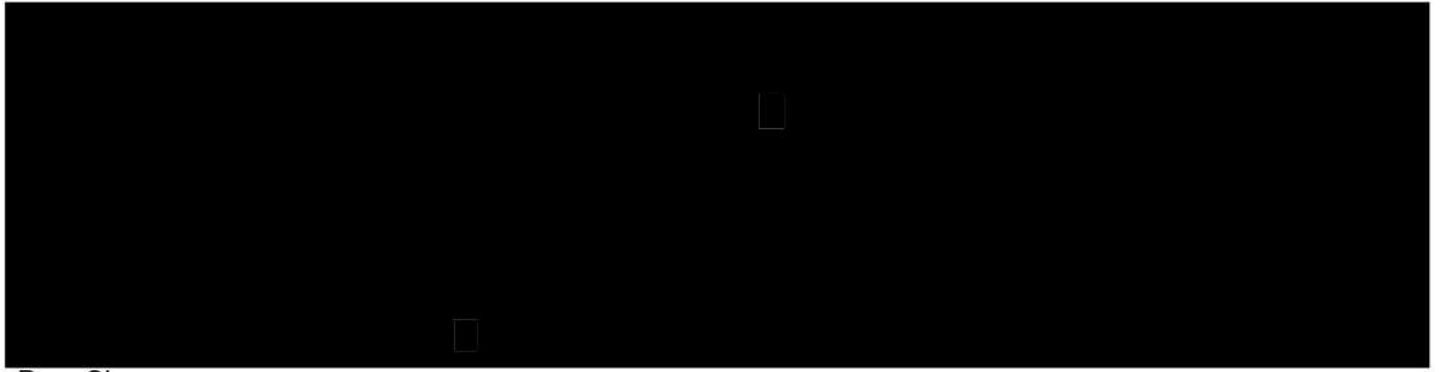
What improvements or modifications would you suggest?

The Town Centre Boundary should be amended to include the former Cutts garage, reflecting the boundary in the adopted Local Plan. The following plan shows the existing boundary outlined in red which should be retained:





Rep #23 - Resident



Dear Sirs,

I understand you are seeking comments on the Chipping Campden Neighbourhood Plan.

There are some points in the plan that I think perhaps give the wrong emphasis in places particularly on holiday lets where I would welcome a greater degree of control through some form of licensing / permissions.

I regard the green spaces as an essential part of the plan.

Other than that I welcome the fact that the plan is near to being adopted after more than 10 years in preparation.

Please would you keep me informed of progress.

With kind regards,



Date: 14 August 2025
Our ref: 518390
Your ref: Chipping Campden Neighbourhood Plan



Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

Cotswold District Council

BY EMAIL ONLY

neighbourhood.planning@cotswold.gov.uk

Dear Sir/Madam

Chipping Campden Neighbourhood Plan - Regulation 16 Consultation

Thank you for your consultation on the above dated 04 July 2025.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.

Natural England does not have any specific comments on this draft neighbourhood plan.

However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan and to the following information.

Natural England does not hold information on the location of significant populations of protected species, so is unable to advise whether this plan is likely to affect protected species to such an extent as to require a Strategic Environmental Assessment. Further information on protected species and development is included in [Natural England's Standing Advice on protected species](#).

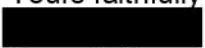
Furthermore, Natural England does not routinely maintain locally specific data on all environmental assets. The plan may have environmental impacts on priority species and/or habitats, local wildlife sites, soils and best and most versatile agricultural land, or on local landscape character that may be sufficient to warrant a Strategic Environmental Assessment. Information on ancient woodland, ancient and veteran trees is set out in Natural England/Forestry Commission [standing advice](#).

We therefore recommend that advice is sought from your ecological, landscape and soils advisers, local record centre, recording society or wildlife body on the local soils, best and most versatile agricultural land, landscape, geodiversity and biodiversity receptors that may be affected by the plan before determining whether a Strategic Environmental Assessment is necessary.

Natural England reserves the right to provide further advice on the environmental assessment of the plan. This includes any third party appeal against any screening decision you may make. If an Strategic Environmental Assessment is required, Natural England must be consulted at the scoping and environmental report stages.

For any further consultations on your plan, please contact: consultations@naturalengland.org.uk.

Yours faithfully


Consultations Team

Annex 1 - Neighbourhood planning and the natural environment: information, issues and opportunities

Natural environment information sources

The [Magic](http://magic.defra.gov.uk/)¹ website will provide you with much of the nationally held natural environment data for your plan area. The most relevant layers for you to consider are: **Agricultural Land Classification**, **Ancient Woodland**, **Areas of Outstanding Natural Beauty**, **Local Nature Reserves**, [National Parks \(England\)](https://www.gov.uk/government/publications/national-parks-england), **National Trails**, **Priority Habitat Inventory**, **public rights of way (on the Ordnance Survey base map)** and **Sites of Special Scientific Interest (including their impact risk zones)**. Local environmental record centres may hold a range of additional information on the natural environment. A list of local record centres is available from [the Association of Local Environmental Records Centres](http://www.local-environmental-records-centres.org/).

Priority habitats are those habitats of particular importance for nature conservation, and the list of them can be found [here](#)². Most of these will be mapped either as **Sites of Special Scientific Interest**, on the Magic website or as **Local Wildlife Sites**. Your local planning authority should be able to supply you with the locations of Local Wildlife Sites.

National Character Areas (NCAs) divide England into 159 distinct natural areas. Each character area is defined by a unique combination of landscape, biodiversity, geodiversity and cultural and economic activity. NCA profiles contain descriptions of the area and statements of environmental opportunity, which may be useful to inform proposals in your plan. NCA information can be found [here](#)³.

There may also be a local **landscape character assessment** covering your area. This is a tool to help understand the character and local distinctiveness of the landscape and identify the features that give it a sense of place. It can help to inform, plan and manage change in the area. Your local planning authority should be able to help you access these if you can't find them online.

If your neighbourhood planning area is within or adjacent to a **National Park** or **Area of Outstanding Natural Beauty** (AONB), the relevant National Park/AONB Management Plan for the area will set out useful information about the protected landscape. You can access the plans on from the relevant National Park Authority or Area of Outstanding Natural Beauty website.

General mapped information on **soil types** and **Agricultural Land Classification** is available (under 'landscape') on the [Magic](http://magic.defra.gov.uk/)⁴ website and also from the [LandIS website](http://www.landis.org.uk/index.cfm)⁵, which contains more information about obtaining soil data.

Natural environment issues to consider

The [National Planning Policy Framework](https://www.gov.uk/government/publications/national-planning-policy-framework--2)⁶ sets out national planning policy on protecting and enhancing the natural environment. [Planning Practice Guidance](http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/)⁷ sets out supporting guidance.

Your local planning authority should be able to provide you with further advice on the potential impacts of your plan or order on the natural environment and the need for any environmental assessments.

Landscape

Your plans or orders may present opportunities to protect and enhance locally valued landscapes. You may want to consider identifying distinctive local landscape features or characteristics such as ponds, woodland or dry stone walls and think about how any new development proposals can respect and enhance local landscape character and distinctiveness.

If you are proposing development within or close to a protected landscape (National Park or Area of Outstanding Natural Beauty) or other sensitive location, we recommend that you carry out a landscape assessment of the proposal. Landscape assessments can help you to choose the most appropriate sites for development and help to avoid or minimise impacts of development on the landscape through careful siting, design and landscaping.

¹ <http://magic.defra.gov.uk/>

² <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

³ <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making>

⁴ <http://magic.defra.gov.uk/>

⁵ <http://www.landis.org.uk/index.cfm>

⁶ <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

⁷ <http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/>

Wildlife habitats

Some proposals can have adverse impacts on designated wildlife sites or other priority habitats (listed [here](#)⁸), such as Sites of Special Scientific Interest or [Ancient woodland](#)⁹. If there are likely to be any adverse impacts you'll need to think about how such impacts can be avoided, mitigated or, as a last resort, compensated for.

Priority and protected species

You'll also want to consider whether any proposals might affect priority species (listed [here](#)¹⁰) or protected species. To help you do this, Natural England has produced advice [here](#)¹¹ to help understand the impact of particular developments on protected species.

Best and Most Versatile Agricultural Land

Soil is a finite resource that fulfils many important functions and services for society. It is a growing medium for food, timber and other crops, a store for carbon and water, a reservoir of biodiversity and a buffer against pollution. If you are proposing development, you should seek to use areas of poorer quality agricultural land in preference to that of a higher quality in line with National Planning Policy Framework para 112. For more information, see [Guide to assessing development proposals on agricultural land](#)¹².

Improving your natural environment

Your plan or order can offer exciting opportunities to enhance your local environment and should provide net gains for biodiversity in line with the [National Planning Policy Framework](#). If you are setting out policies on new development or proposing sites for development, you should follow the biodiversity mitigation hierarchy and seek to ensure impacts on habitats are avoided or minimised before considering opportunities for biodiversity enhancement. You may wish to consider identifying what environmental features you want to be retained or enhanced or new features you would like to see created as part of any new development and how these could contribute to biodiversity net gain and wider environmental goals.

Opportunities for environmental enhancement might include:

- Restoring a neglected hedgerow.
- Creating a new pond as an attractive feature on the site.
- Planting trees characteristic to the local area to make a positive contribution to the local landscape.
- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
- Incorporating swift boxes or bat boxes into the design of new buildings.
- Think about how lighting can be best managed to reduce impacts on wildlife.
- Adding a green roof to new buildings.
- Providing a new footpath through the new development to link into existing rights of way.

Site allocations should be supported by a baseline assessment of biodiversity value. The statutory [Biodiversity Metric](#) may be used to understand the number of biodiversity units present on allocated sites. For small development allocations the [Small Sites Metric](#) may be used. This is a simplified version of the statutory [Biodiversity Metric](#) and is designed for use where certain criteria are met. Further information on biodiversity net gain including [planning practice guidance](#) can be found [here](#)

You may also want to consider enhancing your local area in other ways, for example by:

- Setting out in your plan how you would like to implement elements of a wider Green Infrastructure Strategy (if one exists) in your community.
- Assessing needs for accessible greenspace and setting out proposals to address any deficiencies or enhance provision. Natural England's [Green Infrastructure Framework](#) sets out further information on green infrastructure standards and principles
- Identifying green areas of particular importance for special protection through Local Green Space designation (see [Planning Practice Guidance](#)¹³).
- Managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips in less used parts of parks or on verges, changing hedge cutting timings and frequency).

⁸ <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

⁹ <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>

¹⁰ <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

¹¹ <https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals>

¹² <https://www.gov.uk/government/publications/agricultural-land-assess-proposals-for-development/guide-to-assessing-development-proposals-on-agricultural-land>

¹³ <https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space>

- Planting additional street trees.
- Identifying any improvements to the existing public right of way network, e.g. cutting back hedges, improving the surface, clearing litter or installing kissing gates) or extending the network to create missing links.
- Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition, or clearing away an eyesore).

Natural England's [Environmental Benefits from Nature tool](#) may be used to identify opportunities to enhance wider benefits from nature and to avoid and minimise any negative impacts. It is designed to work alongside the statutory [Biodiversity Metric](#) and is available as a beta test version.

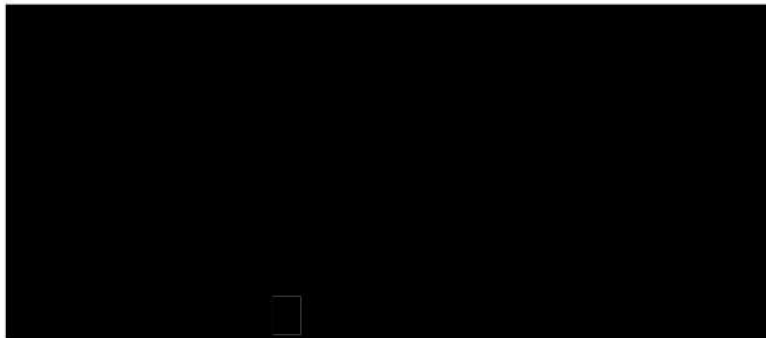
Rep #25 - Resident

How to use this form

Please complete Part A in full, in order for your representation to be taken into account at the Neighbourhood Plan examination.

Please complete Part B, identifying which paragraph your comment relates to. Repeat this for subsequent comments relating to other sections of the plan.

Part A

A large black rectangular box redacting the content of Part A. A small square icon is visible near the bottom center of the redacted area.

Organisation and position (if applicable):

Date: 14.08.2025

Do you wish to be notified of the Local Planning Authority's Decision to 'make' (adopt) the Plan, under Regulation 19 of the Neighbourhood Planning (General) Regulations 2012

Please delete as applicable: YES

Part B

Which part of the document does your representation relate to?

Paragraph number: Section 6. Appendix 7 Local Green Spaces. Local Green Space 21 – The Cley.

Policy reference:

Do you support, oppose, or wish to comment on this paragraph? (Please tick)

Support ☒ Support with modifications ☐ Oppose ☐ Have comment ☐

Please give details of your reasons for support or opposition or make comments:

I strongly support the inclusion of The Cley as a designated Local Green Space. I live on Grevel Lane, with our garden backing directly onto The Cley, and over the past two years, my young children and I have witnessed an extraordinary variety of wildlife. It truly is a haven for nature.

We've observed badgers, foxes, hedgehogs, deer, stoats, bats, owls, partridges, pheasants, green and spotted woodpeckers, sparrowhawks, and even peregrine falcons — not to mention a vast array of insects and garden birds. This level of biodiversity is rare and precious, especially at a time when England is losing wildlife species at an alarming rate. Protecting spaces like The Cley is essential for preserving our natural heritage.

In addition to its ecological value, The Cley plays a vital role in protecting our community. Being downhill from The Hoo, we experience significant water runoff, which would be far worse without the natural flood defence provided by the trees and vegetation. The woodland helps absorb and slow the flow of water, reducing the risk of flash flooding. The trees also contribute to cleaner air, which is a noticeable benefit for those of us living nearby.

What improvements or modifications would you suggest?

It would be wonderful if the landowner considered planting wildflower meadows to further support pollinators and enhance the beauty of the area.

Please make sure any additional pages are clearly labelled

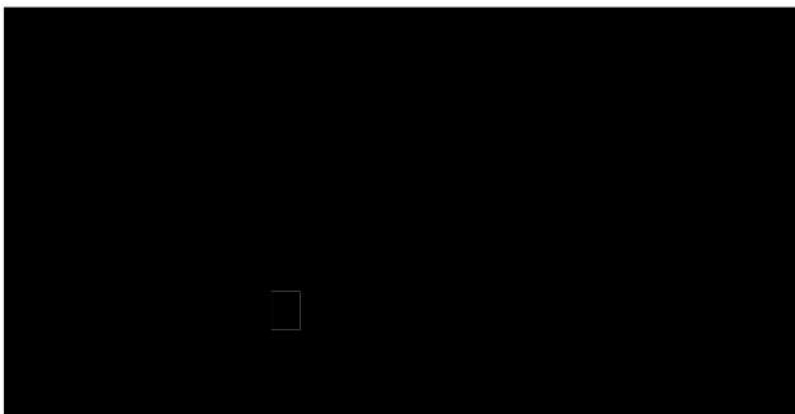
Rep #26 - Resident

How to use this form

Please complete Part A in full, in order for your representation to be taken into account at the Neighbourhood Plan examination.

Please complete Part B, identifying which paragraph your comment relates to. Repeat this for subsequent comments relating to other sections of the plan.

Part A



Date: 14/08/2025

Do you wish to be notified of the Local Planning Authority's Decision to 'make' (adopt) the Plan, under Regulation 19 of the Neighbourhood Planning (General) Regulations 2012

Please delete as applicable: YES / NO

Part B

Which part of the document does your representation relate to?

Paragraph number: Section 6, Appendix 7. Local Green Spaces, Local Green Space 21. - The Cley (page 158)

Policy reference: Annex A. Regulation 15 Draft CCNDP 04.03.25

Do you support, oppose, or wish to comment on this paragraph? (Please tick)

Support ☒ Support with modifications ☐ Oppose ☐ Have comment ☐

Please give details of your reasons for support or opposition or make comments:

There are several reasons for The Cley to be designated a Local Green Space. The Biodiversity on the land is truly staggering. We have long term, current and active sightings of Badgers, Peregrine Falcons, Sparrow Hawks, Tawny Owls, Pipistrelle Bats, Muntjac Deer, Stoat, Field Mice, Rabbit, Fox, Hedgehogs, Green Woodpeckers, Greater Spotted Woodpecker and many more. The Deciduous Woodland in The Cley is key to providing the habitat for the animals mentioned and more. Deciduous woodland is designated as a priority habitat under Section 41 of the Natural Environment and Rural Communities Act 2006 in England. This means it is considered a habitat of principal importance for conserving biodiversity in England. The woodland and wild grassland also serve as a flood defence to the town. The trees hold a huge amount of water and their roots slow the flow of water off The Hoo and into the town. The grassland and dense undergrowth stabilise the soil and reduce chances of flash flooding. The Cley acts as a natural barrier on the hillside between The Hoo and Aston Road. The Cley will hold enormous volumes of water during wet periods, allowing a slow release via natural evaporation and absorption. The Cley also has fantastic aesthetic value for the town. It frames Aston Road enhancing the beauty and appeal of the neighbourhood, contributing to a sense of place. It also borders

the very popular public footpath between Aston Road and The Cotswold Way, exposing walkers to the rich biodiversity within The Cley.

What improvements or modifications would you suggest?

Please make sure any additional pages are clearly labelled



One of the changes brought about by the Localism Act was to encourage Chipping Campden Town Council to develop a Neighbourhood Development Plan (Plan) to reflect the needs and priorities of residents of Chipping Campden and ultimately the electors. The Plan was to be resident led and if formally adopted by the 2020 (1st April 2025) voters registered becomes a legally binding document used when future applications for development submitted to a higher authority trigger publication of the application which will enable anyone to respond and where there is an adopted plan in place it will be used by developers, planning and conservation officers and others to consider the application. For example, applications are required for building works, advertising, change of use, cutting of trees, a boards and so on.

I have read the Plan in the library and believe it does not conform.

The Plan Trying to respond I find there are no paragraphs as required to refer to on the form for a response.

I can see as can others and the Examiner that in particular Cotswold District Council can be seen to have a routine or practice to produce legally binding documents on A4, in black and white, with paragraph numbers, with one column and few photographs. See Local Plan in force. This document does not conform to other Cotswold District Council legally binding documents.

Even though only a draft the Plan is a document to be formally voted upon by 2020 voters and if approved will become a legally binding document.

As a proposed legally binding document it includes commercial footnotes of advertisements see (page 55 footnote 6) has 80 or more photographs, on landscape has no paragraph numbers and does not conform to the

routine or practice of Cotswold District Council or indeed Gloucestershire County Council documents intended to be legally binding. As a binding legal document it is intended to be read by developers, planning and conservation offices and others and it would be reasonable for the Examiner to examine whether the Plan as presented can if formally adopted is fit to be used. In my view the Plan is really not fit for the purpose of being used as a binding legal document. As well as commercial advertisements there is no housing land allocated for use in the future. Indeed, the housing at Aston Road on page 35 has lost its outline planning application and the wording which could have been amended ages ago to state housing in the future on this land would be agreeable has not been altered. It should be altered to conform to Cotswold District Council's legally binding documents to be easily used by developers, planning and conservation officers and others.

Page 4 The plan with the red line should be enlarged so the red line of the boundary of the parish is clear and a plan including the development boundary could only be helpful to those reading and responding to the Plan if one was included.

Para 2 Responses from 5 November 2013 have not been displayed. Few genuine resident responses to what development the resident believes should be or should not be are found in consultation bundle. The Plan fails to address clearly as required where residents wish development to take place and where they do not. Whether developments are of a high quality or not is not the subject of the Plan but in the design guide.

Page 10 Irrelevant. The red line parish boundary on page 4 is sufficient. The development boundary is still missing. The national cycle network irrelevant. Should be removed.

Page 11 The red line drawn around the parish boundary is far better on page 4. Pellegrini just repeats. The words to the left are included in a separate document in any event and are irrelevant. Page should be removed.

Page 13 The town is no longer referred to as the jewel of the Cotswolds in any document of Cotswold District Council.

I suggest on the penultimate line "where" should be "while" the historic legacy is preserved?

Page 14 and 15 Objectives

Paragraph 1 As the objective of the Localism Act is to influence the location of future development

Where future development land is proposed is lacking .

I propose:

The proposed Dr surgery has been lost with the Aston Road development outline planning permission expiring. However, Cutts building and yard off Sheep street could be so developed if included in the Plan

The land between Calf Lane and the Cam owned by Landmark trust if agreed could be drained and developed to use as a paid car park for those working in the town.

Where residents do not wish development is not clearly spelled out specifically but I believe the list Green Spaces page 88 may intend and should say so.

Land beside the river Cam

Outside existing development boundary

Page 18 OverView.

The jewel of the cotswolds should be removed as clearly it is no longer considered by CDC to be so described in the Local Plan.

The fact that every building on the High Street is listed except the Baptist Church should be clarified and the two paragraphs highlighted could be moved to Objectives page 14 . The remainder does not relate to development. The Music festival does not relate to development and should be removed as well as the paragraph on walking to public footpaths which are covered by the need for an application to if a developer intends to alter.

Page 20 Pellegrin map of historic features. It is far too small to be relevant. Does not indicate where the historic features referred to in the column on the right are. Please remove. There is another page 22 which again fails to indicate all the historic features referenced in the column. Remove too. There is indeed more plans further on.

Page 21 Chipping Campden

Page 22 see 20

Pages 26 to 27. Are these pages trying to explain that any development concerning the highlighted heading have sufficient exposure and any more development will be too much. Why not say so? Alter or remove.

The area of flooding by the river Cam could easily be identified as an area not wished to be developed page 14. The map does not assist and should be removed and woodlands would be covered by any application to develop. Remove as Irrelevant.

Page 31 32 33 34 Population characteristics are surely irrelevant. Were there responses that wish development of affordable housing, or housing with only one bedroom or flats. Did such response set out the proposed e in the future? If not I feel these pages are irrelevant.

Pages 30 31 32 34 Population characteristics are irrelevant as do not disclose where future housing is sought to be built. Remove

Page 35 and 36 Obviously should have been updated and amended by Dr Pellegrin or Council to where residents wish development to be in the future now the outline planning permission has been lost.

Pages 44 and 45 Community Aspirations Dr Pellegrin has stated parking cannot be something sought by residents (page 60 Consultations)but left to Gloucestershire county Council. None of the aspiration listed include where development is proposed to meet the aspiration. I

Page 46 Is a map by Dr Pellegrin really needed? Remove.

Page 48. Is this really required as refers to Local Plan to which this Plan is stated to conform. Remove. The footnote at the bottom is incomplete.

Page 51 Sustainable Development No explanation is to relevance of white spaces. There is really no reference to sustainability in the policies referred to.

Page 52 to 63 Chipping Campden Town Council.Objectives The advertisement footnote 6 to Airnb should be deleted despite Dr. Pellegram response JK p 60 in Consultation. Change of use requires a planning application and in the case of the town center High Street usually listed building consent as well. Uses in 2023 seem already outdated for 2025 and could perhaps be better defined and the whole section reduced. On p 57 the Town Council seeks to enlarge the town center boundary which cannot be within the powers of the examiner.h There is still no map of the development boundary. The map of abnb accommodation seems out of place as the Plan is for where proposed development is to take place and the Plan is clear no application is required for a change of use to airb and b .

The Plan could and does not address the look of abandonment of the Kings Hotel in the Square on the High Street with a notice to Covid fixed to the door and what future development the Plan intends for the hotel.

Pages 64 to 69 Irrelevant. What development is proposed? Remove.

Pages 70 to 72. There is a Design Guide. Remove.

Page 73 Policy 3 Design of the built and natural environment.

Page 74 to 76. Non designated. As already mentioned most are preserved and protected by Heritage England .

85 Green Spaces are where those responding wish to see no development and again I wish it was found in Objective. The Westington Green is registered common land.

Pages 90 to 93 Already out of date. Why include.

Page 95 The colours cannot be seen. Amend or remove.

Page 96 – 99 useful

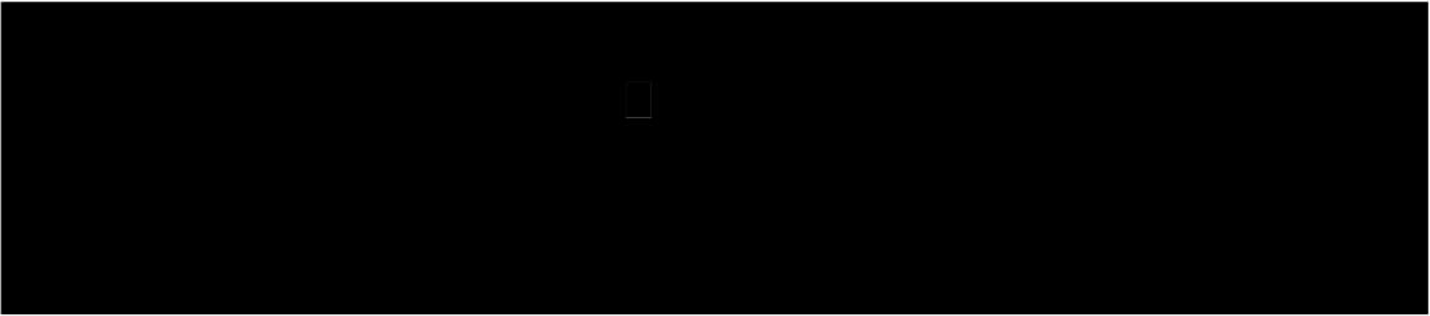
Pages 101to 123 This would be useful if it included permitted use or an alteration with listed building consent found under the building on Cotswold District Council web site rather than what those looking perceive as a permitted use

page 133 to 163 Need editing as includes blank pages and pages that are divided

I wish to be informed of the decision.



14 August 2025



I emailed comments yesterday 14.08.25 at 17.20 and wish to add/make another comment due to the content of email from Mr Walker in reply to mine.

I attach Plan from Chipping Campden Town Council records and note it says submitted 25 February on the cover.

The 80 or so photographs have been removed and the Plan has paragraphs and accords with my comments on my earlier comment and the routine/practice of Cotswold District Council as regards documents intended to become binding legal documents.

I believe this has been submitted to CDC and the matter should be looked into by the team . It seems to be the same as in the library but as I have said without the photographs and readable by developers, planning and conservation officers and others. The Examiner should certainly be made aware



15 August 2025 at 11.21

attached
Plan
Email from and to Mr Walker

Rep #28 - Resident

How to use this form

Please complete Part A in full, in order for your representation to be taken into account at the Neighbourhood Plan examination.

Please complete Part B, identifying which paragraph your comment relates to. Repeat this for subsequent comments relating to other sections of the plan.

Part A



Date: 14th August 2025

Do you wish to be notified of the Local Planning Authority's Decision to 'make' (adopt) the Plan, under Regulation 19 of the Neighbourhood Planning (General) Regulations 2012

Please delete as applicable: YES

Part B

Which part of the document does your representation relate to?

Paragraph number: 106, 107, 108

Policy reference: Policy 6: Local Green Spaces

Do you support, oppose, or wish to comment on this paragraph? (Please tick)

Support ☒ Support with modifications ☐ Oppose ☐ Have comment ☐

Please give details of your reasons for support or opposition or make comments:

We fully support the Local Green Space Policy in order to be consistent with the stated aim of the Neighbour Development Plan to retain Chipping Campden as 'The Jewel in the Cotswolds' whilst meeting the objectives of the Environment and Sustainability Policy.

What improvements or modifications would you suggest?

None

Please make sure any additional pages are clearly labelled



Chipping Campden Neighbourhood Development Plan: pre-examination consultation

Regulation 16 Consultation

Neighbourhood Planning Regulations 2012

Chipping Campden Town Council has submitted a Neighbourhood Development Plan. The Plan sets out a vision for the parish of Chipping Campden, covering both the town and Broad Campden and presents planning policies which they propose be used to determine planning applications locally.

The Neighbourhood Plan and supporting documents are available to view on our website.

All comments must be received by 12 noon on **15th August 2025**. There are a number of ways to make your comments:

Complete an [electronic response form](#)

Complete **this word version** below and email it to: neighbourhood.planning@cotswold.gov.uk

Print the form and post it to: Neighbourhood Planning, Cotswold District Council, Trinity Road, Cirencester, GL7 1PX.

We will accept other comments in writing (including electronic, such as e-mail, provided that a name and address is supplied. We cannot accept anonymous comments.

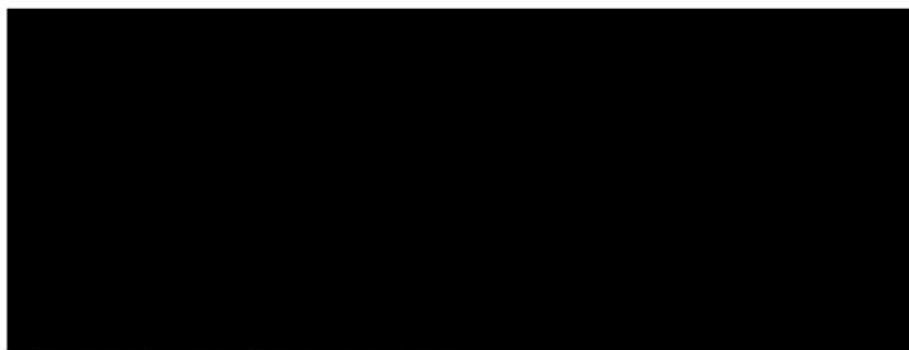
All representations will be publicly available, and identifiable by name and (where applicable) organisation. Please note that your comments, name and address and, if applicable, organisation will be publicly available but your signature, email address and telephone number will be removed. Other personal information provided will be processed by Cotswold District Council in line with Data Protection legislation. To find out how we use your personal data, please view our [privacy notice](#). Representations may include a request to be notified of the local planning authority's decision to make the plan under Regulation 19.

How to use this form

Please complete Part A in full, in order for your representation to be taken into account at the Neighbourhood Plan examination.

Please complete Part B, identifying which paragraph your comment relates to. Repeat this for subsequent comments relating to other sections of the plan.

Part A

A large black rectangular box redacting the content of Part A of the form.

Organisation and position (if applicable): The Campden Society; Committee Member

Date: 15 August 2025

Do you wish to be notified of the Local Planning Authority's Decision to 'make' (adopt) the Plan, under Regulation 19 of the Neighbourhood Planning (General) Regulations 2012

Please delete as applicable: YES

Part B

Which part of the document does your representation relate to?

Paragraph number: 5(d); 4(a); 6.3

Policy reference: **1. Town Centre**

Do you support, oppose, or wish to comment on this paragraph? (Please tick)

Support ☐ Support with modifications ☒ Oppose ☐ Have comment ☒

Please give details of your reasons for support or opposition or make comments:

Town Centre boundary

Although we note the comments made by CDC in relation to the change in use at the former Lloyd's Bank, we remain of the view that the Pharmacy is an essential Town Centre service site, and so we still support the extension of the Town Centre boundary as proposed in the draft NDP. However, we are also still of the view that the boundary should be extended at the other end of Town (the figure on page 97 of the NDP) to include the part of what is known as Cutts Yard that is not currently included, i.e. the garage building. In our view, it would be incoherent to include two separated parts of Cutts Yard but not the central connecting part.

Town Centre accommodation for the elderly

While we agree that accommodation close to or within the Town Centre well adapted for the use of the elderly would be an advantage, we do not agree that conversion of upper floors of commercial Town Centre premises is likely to provide such suitable accommodation for the elderly. While the locations concerned are obviously ideal, the accesses to the upper floors of what are almost all if not all listed buildings do not lend themselves to being suitably adapted for the use of the elderly.

Residential property used as short term let visitor accommodation

We agree that visitor trade is important in supporting the mix and range of facilities in the Town Centre. Further, the NDP notes on p52 that many of the residential use Town Centre properties are short term let (e.g. Air BnB), and that if the number of such properties is allowed to grow too far (in our view, any further than the current level), that would have a very negative impact on the vitality of the Town Centre, to the detriment of the residents and visitors alike. In our view the same point applies outside the defined Town Centre but within the Development Boundary. We also note that the data on pg31 highlights the lack of privately rented accommodation (long-term lets) compared to the national average.

We strongly support the suggestion made in the NDP that the creation of new non-serviced visitor accommodation (short-term let properties) throughout the area covered by the NDP (i.e. not just in the Town Centre) should be resisted to the extent that relevant provisions in Planning Regulations provide a basis for such resistance.

Change of use in the Town Centre

In the above context particularly, but also relevant to Policy 2, one important reference point for judging the appropriateness of a change of use application is the impact on the vibrancy (or also “vitality”) of the High Street (or also “Town Centre”). Judging that impact is highly subjective unless some appropriate criteria are established. Nonetheless, short-term lets are likely to remain vacant for parts of the year. Vibrancy, in our view, should be considered throughout the year. As noted in our comments on Policy 2, in our view all applications for a change of use away from a Town Centre use (eg from Commercial to residential) should be resisted; all such changes diminish the vitality and vibrancy of the Town Centre.

Parking Provision

As noted in the draft NDP, it is not possible to draw strong conclusions from the results of the Parking Survey. We support the principle of finding out what are the views of residents in relation to parking. However, in our view, the process would be more successful and usable if it was in the context of the development of a wider strategy covering both transport (public and private), an active travel policy and parking in the neighbourhood. Further, the draft NDP suggests that the Town needs a new car park for cars and coaches. The great majority of visitors do not arrive by coach, and it is not clear that it would be positive for the Town if the number that do so were to increase. Coach visitors do not remain in the town for more than a few hours and do not generally use hospitality venues and the economic benefit to the town is much less than visitors who stay overnight. We therefore support the principle of a new car park for cars.

In that context, we strongly support the move towards changing the existing school car park to one for general public use, while acknowledging that this will only happen in the context of the wider Aston Road development going ahead; we acknowledge that the initial planning application for this development has lapsed, but we expect that it will be re-born as such a development clearly has significant advantages for the Town, including providing new housing that contributes to the Local Plan targets. If this does go ahead, and the provision of a new Town car park is combined with some restriction on High Street parking (e.g. short term and residents only), it is essential that particular provision is made for those who work in the various commercial and retail premises in the Town Centre to be able to use the new public car park either free of charge or at heavily discounted rates (e.g. an annual easily affordable pass).

What improvements or modifications would you suggest?

See comments above

Part B contd

Which part of the document does your representation relate to?

Paragraph number: 5(e); 4(e); 4(d)

Policy reference: **2. Community Facilities and Infrastructure**

Do you support, oppose, or wish to comment on this paragraph? (Please tick)

Support ☐ Support with modifications ☒ Oppose ☐ Have comment ☒

Please give details of your reasons for support or opposition or make comments:

Doctors' Surgery

We note the presumption under Local Plan EC8 is that it is not appropriate to move the Doctor's Surgery away from the Town Centre (recognising that the current Surgery is not within the Town Centre as defined but is close by). We are concerned that there seems to be a presumption that a new Surgery would be part of the Aston Road development plan although the advantages of such a move have not in our view been demonstrated to outweigh the disadvantages, in particular in relation to how patients access the Surgery. The NDP notes an aspiration to relocate St James's Primary School to a site off the Bratches. If that goes ahead, the vacated current school site would seem a better location for a new Surgery, being large enough and more central to the Town. Noting that the site of St James is probably Diocesan property and will therefore be subject to the constraints of disposal under Diocesan governance regarding gaining the maximum values of the asset.

Public Transport

The re-opening of the Train Station is noted as an aspiration and supported by the Town Council and is supported by the Campden Society. We note however that the reference to such re-opening is not included in the proposed revisions to the Local Plan. This is an example of the in our view disingenuous separation of the CCNDP and the Local Transport Plan; we acknowledge this is a matter not in the power of the Town Council to rectify. However, if it is possible in the context of the regulations around the CCNDP to include more about the transport needs of the community, especially in the context of the move towards zero carbon, we would strongly urge that such comment should be included. The case for re-opening a train station at the old site outside Chipping Campden is strengthening and should perhaps be better reflected in this section under a Public Transport heading on Page 62 alongside bus-stops. It should also feature as a separate section under Public Transport in Appendix 4. The development of a railway station, and the land around this could provide a real opportunity to the economic and social development of our market town. Greater emphasis should be given in the CCNDP document for the planning and development of public transport services. There

is little reference here to public transport links. There is some reference to this in the Community Concerns/Aspirations section (pages 39-42), but these are omitted in Table 6 and Appendix 4. The CCNDP shows a photograph of the Hedgehog bus (a volunteer-led initiative) but fails to make any reference to the current commercial public transport bus services franchises. Nor is there any reference to the need to preserve and provide appropriate bus stop facilities within the town centre. These need to be provided and be accessible within Chipping Campden, particularly given that we are all expected to see less reliance on private car usage.

Additional items

The following items should be added to Table 8: • bus-stops • public footpaths • EV charging points, or potential EV charging point sites • litter bins • amenity spaces such as areas of green space such as verges, patches of green space and grassed roundabouts.

The description for Campden Home Nursing should include 'Bereavement Services for bereaved children and adults'

What improvements or modifications would you suggest?

See comments above

Part B contd

Which part of the document does your representation relate to?

Paragraph number: 5(f)

Policy reference: **3. Design Code and Built Environment**

Do you support, oppose, or wish to comment on this paragraph? (Please tick)

Support ☒ Support with modifications ☐ Oppose ☐ Have comment ☐

Please give details of your reasons for support or opposition or make comments:

We acknowledge the edits that have been made to the Guide and we are generally in agreement with the revised document,

What improvements or modifications would you suggest?

See comments above

Part B contd

Which part of the document does your representation relate to?

Paragraph number: 5(g); 6.5

Policy reference: **4. Non-designated Heritage Assets**

Do you support, oppose, or wish to comment on this paragraph? (Please tick)

Support ☐ Support with modifications ☒ Oppose ☐ Have comment ☒

Please give details of your reasons for support or opposition or make comments:

The Campden Society put forward a list of additional features throughout the Town which it submitted should be added to the list at pg 71 and appendix 6. The Town Council responded that it was not willing to consider any additional items. We submit that the Council should revisit the stance. There is no good reason not to entertain suggestions for additional features. The additional features proposed by the Campden Society are set out on pgs 136 and 137 of the Chipping Campden Parish Neighbourhood Plan Consultation Report February 2025.

There should be a watching brief for new assets with designated authority for such brief.

We concur with the items listed and we note that there is no clear definition of what constitutes a heritage asset. We suggest the TC draws up a Local Heritage List following Historic England Advice Note 7 or similar. The TCS also suggests that the TC have a watching brief on any contemporary and new installations that may qualify. Here is a list of other Non-Designated Heritage Assets which we feel contribute to the unique character of the town which we would like added. This list includes already identified and numbered NDHAs where useful. Street Furniture and Environment.

What improvements or modifications would you suggest?

See comments above

Part B contd

Which part of the document does your representation relate to?

Paragraph number: 5(h); 6.2; 6.6

Policy reference: **5. Biodiversity Net Gain and Environment**

Do you support, oppose, or wish to comment on this paragraph? (Please tick)

Support ☐ Support with modifications ☒ Oppose ☐ Have comment ☒

Please give details of your reasons for support or opposition or make comments:

We agree with the wording of Policy 5 but would add further detail. We suggest that the list of target sites suitable for biodiversity net gain compiled by GWT should be supplemented with local knowledge noting opportunities for BNG in the town's natural setting including the management of grass verges and nominated Local Green Spaces; and that the LNRAs should be linked into wildlife corridors, if possible, e.g. Areas 1 & 2 should be linked along the water course of the Cam.

We suggest further detail is added to this Policy (cross referencing with the Design Code and Building with Nature/Climate Resilient Water Management) addressing the mitigation of increasing Flood Risk in the town due to rainfall intensity due to the Climate Emergency. Any new development which doesn't fully address – and future proof – this increasing risk (including management of waste water) should be opposed. We also suggest that the importance of the remaining open ditches in the town is noted and that these should not be covered. In addition, the contribution of the nominated LGS to the town's natural flood management should be noted.

We suggest further detail is added to this Policy (cross referencing with the Design Code and Building with Nature) addressing Light Pollution in the town to the effect that any new development should guarantee it doesn't increase this pollution but instead conserves and enhances the town's natural setting and biodiversity.

We suggest that the guidance is given a more practical focus. For example, ref point 2 a clear commitment not to build on flood plains or in areas where there is a known flooding risk.

We note that there are no designated Gloucestershire Wildlife Trust Wildlife Sites within the list on Table 7. GWT notes 850 Local Wildlife sites on their website and we would hope that Chipping Campden could be a part of that.

What improvements or modifications would you suggest?

See comments above

Part B contd

Which part of the document does your representation relate to?

Paragraph number: 5(i); 6.7

Policy reference: **6. Local Green Spaces**

Do you support, oppose, or wish to comment on this paragraph? (Please tick)

Support ☒ Support with modifications ☐ Oppose ☐ Have comment ☒

Please give details of your reasons for support or opposition or make comments:

We continue to support the designation of all the 22 sites named in the NDP as Local Green Spaces.

Noting comments made in the Consultation particularly in relation to site 22, The Craves,:

1. The site is visible from within the Town (not only from within the site itself), and from outside the Town as well.
2. We support the response noted by the Town Council in the Consultation, which is quoted below:

"Site 22 is The Craves. The land parcel does not meet the threshold of a large tract of land. This has been considered in case law. It is understood to be considerable larger, at around 25Ha, if considered as a stand-alone factor affecting the designation of a Local Green Space. The Regulation 14 version of the CCNDP Local Green Spaces Appendix 8 contains an entry for site 22 The Craves. An explanation is provided as to the historic significance, the use by the public and the contribution the site makes to the setting of the town which was prepared by CCTC. CCTC wishes to maintain this proposed designation. Appendix 8 also contains accurate site outlines for each proposed local green space. It acknowledges the previous objections that have been made to the proposal for designation. Notwithstanding these objections, CCTC has resolved to maintain NDP proposals to designate these sites as Local Green Spaces."

Noting comments made in the Consultation particularly in relation to sites 20 (The Hoo East) and 21, (The Cley):

1. : We support the response noted by the Town Council in the Consultation, which is quoted below, although the comment regarding the separation of the two sites by Hoo Lane applies to sites 19 (Hoo West) and 20 (Hoo East):rather than site 21 (The Cley).

"With regard to the question of whether these sites form extensive tracts of land, it is understood that this may not be the case, purely considering their size. The two sites are divided from each other by Hoo Lane and a wide strip of development and are considered by CCTC to be of different character and are therefore different sites providing different benefits and having different significance to the local community. The value/significance of the spaces is explained in site entries for site 20 and site 21 in Appendix 6 which were prepared by CCTC. In other respects, CCTC have reviewed the comments received and have resolved not to delete these sites and maintain their proposals for designation for the reasons set out in the appendix."

What improvements or modifications would you suggest?

See comments above

Part B contd

Which part of the document does your representation relate to?

Paragraph number: 5(a); 5(b)

Policy reference: **Other comments**

Do you support, oppose, or wish to comment on this paragraph? (Please tick)

Support ☐ Support with modifications ☐ Oppose ☐ Have comment ☒

Please give details of your reasons for support or opposition or make comments:

Private Management Companies established in new developments

TCS would like to see an end to the inequitable reliance by both local councils and developers in setting up management companies for new developments. New residents are effectively forced into business relationships with their neighbours to pay for services that they already pay for in their community charge taxes. For example, the failure by the Local Authority to adopt new roads built, to pay for street lighting and other maintenance charges such as for the maintenance of green spaces.

It is an inequitable situation between the services residents receive outside such developments and those within new developments when both pay the same level of Council Tax. Ultimately, if councils want new development and new housing to happen, the concomitant costs of the public services that arise from such developments needs to be factored in to Local Authority finances.

Social/Affordable Housing

The draft CCNDP does comment that there is a lack of social housing that needs to be addressed. It also notes that a large proportion of the properties built over the most recent 5-year period have been larger (4+ bedrooms), with many being under occupied per the most recent census. Drawing a distinction between market demand and need, the data indicates that more larger and fewer smaller dwellings have been built than have been needed. We note in this connection the direction of travel indicated by the proposed revisions to the Local Plan, i.e. that while acknowledging that the market demand for larger dwellings in the North Cotswolds generally is high, the focus on the building of new dwellings should nevertheless be on meeting need rather than market demand.

In that context, and in our view consistent with the requirement that the CCNDP should support sustainable development, we would like to add to Page 41 of 76 a positive endorsement of the principle of building > 100 dwellings off Aston Road, subject to conditions. These should include:

1. the size and tenancy of the proposed dwellings
2. a firm commitment to design excellence not just compliance with the Design Guide.
3. Urban Planning that includes shared green spaces that are well thought through and include and benefit the whole development.
4. We proposed that GCC enter into a development agreement with a developer in order to retain control of the design until the development is complete. This is known to have commercial benefit as it raises the standard of design and build
5. Zero carbon development, including solar panels and ground source pumps) + active flood risk management and SUDS
6. Focus on Active Travel in the development
7. Biodiversity Net Gain measures including minimising light pollution.
8. All public areas of the development to be adopted by GCC (and not retained by the developer) as part of the planning consent.

As part of the TCS response to the consultation on the draft CCNDP we included the letter that TCS wrote to GCC in response to the consultation on the Aston Road proposal. In relation to the nature and tenancy of new residential building, we would suggest, consistent with the proposed revisions to the Local Plan, that:

1. Any new building outside the existing Development Boundary should be 100% affordable
2. Any new building development of more than 10 dwellings should include 40% (calculated on the basis of gross internal area) either First Homes or homes for social rent
3. Viability Statements justifying non-compliance with the above should only be accepted in cases where there have been very significant and unforeseeable changes in the relevant circumstances. We understand that may mean that the relevant land is worth less than was thought, or possibly less than a Developer paid for it – that is part of a developer's risk.

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9. the size and tenancy of the proposed dwellings
10. a firm commitment to design excellence not just compliance with the Design Guide.

11. Urban Planning that includes shared green spaces that are well thought through and include and benefit the whole development.
12. We proposed that GCC enter into a development agreement with a developer in order to retain control of the design until the development is complete. This is known to have commercial benefit as it raises the standard of design and build
13. Zero carbon development, including solar panels and ground source pumps) • active flood risk management and SUDS
14. Focus on Active Travel in the development
15. Biodiversity Net Gain measures including minimising light pollution.
16. All public areas of the development to be adopted by GCC (and not retained by the developer) as part of the planning consent.

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What improvements or modifications would you suggest?

See comments above



Representation to the Chipping Campden Neighbourhood Plan

Regulation 16 consultation

Please find below comments from **Cotswold District Council** (CDC) on the Chipping Campden Neighbourhood Plan (the Plan).

CDC acknowledges the work that has been put in by the team behind this Plan and commend the team on a well presented and attractive document, which should engage residents and other stakeholders.

The following comments, observations and suggested amendments have been written to try to identify either points which may not meet the Basic Conditions against which the NDP will be assessed, or where the wording used may be open to interpretation during the development management process.

The following submission largely duplicates that from the Reg 14 representation. CDC continues to support the general aspirations of the Reg 16 NDP. We are aware that work has been done to enhance the plan since Reg 14, although there are areas we consider need resolving, as noted in our earlier position.

p.14, Objectives, Environment and Sustainability. The second objective here - 'to conserve and enhance the natural setting that characterises the town' feels like it would be equally applicable to the village of Broad Campden. We would suggest a light touch review to ensure the wording is inclusive of the two settlements/parish hinterland where applicable. Picking up on this, we commend the summary information pp20-22 celebrating the distinction between the village and the town.

p.15 and beyond, reference to Cotswold Area of Outstanding Natural Beauty. The Cotswolds AONB is now formally referred to as the Cotswold National Landscape – so this paragraph and subsequent references should be updated for clarity.

p.19 fig 2, p.21 fig 3, p.22 fig 4 – noting that there is explanation in the supporting text, it would be useful if a key could be added to these maps to enhance comprehension.

We note that fig 2, and fig 3 have had a key added.

Pp19-20 The reference to historic “features of Chipping Campden” actually refers to designated heritage assets – listed buildings, SAMs, Con Areas and the like. ‘Features’ is a word usually used to refer to parts of assets e.g. ‘the windows form a significant feature of the listed building’, so we’d suggest a rewording. This section does not cover non-designated heritage assets – some brief reflection on the positive impact of such could round out the pen picture of the town and provide a neat ‘hook’ in this introduction to the focus of policy 4. *Last point still to be resolved*

p.26 Final paragraph, correctly states – 'There are no special designations such as sites of scientific interest in the parish though they are immediately outside.' However, we note that there are some key wildlife sites within the parish – perhaps these could be referenced to enhance this section. Alternatively, the text could be adjusted to note that there are no nationally designated sites.

p.34 First paragraph, suggests that development on greenfield land is a consequence of poor use of previously developed land (PDL). We question the validity of this statement – the simple fact is that there is a limited supply of PDL within the neighbourhood area and the wider district– and much of the land that might be considered PDL does not sit in comfortable proximity to existing settlements (for example old airfields).

p.44 Figure 8. We'd recommend a legend for this map, to be clear that these points are intended to be indicative, rather than allocative, in nature. *still to be resolved*

Policy 1: Chipping Campden Town Centre

It would help if the paragraphs and policy clauses of the NDP were numbered for ease of reference.

p 55 final paragraph, and **clause one of the policy** states that appendix 3 should be considered as a 'baseline' for Local Plan Policy EC8. We're unclear what this means in practice - where and for what purpose does Policy EC8 use a baseline? (p63) *unsure this has been addressed*

p.56 Paragraph 6. The wording rather infers that Local Plan policy drives permitted development rights, rather than these rights being directed by national regulation. (para 5, pg 59)

p.57, Paragraph 1 notes correctly that movement between short-term lets and principal residential use is not subject to planning control, but it may be worth noting that Government consulted last year of introducing a new use class, and recently in February issued a press release suggesting this would be taken forward. We may not see further movement on this within the formative period of the neighbourhood plan, but can expect to see progress certainly within the plan period, so a reference might be useful - [Short-term lets rules to protect communities and keep homes available - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/news/short-term-lets-rules-to-protect-communities-and-keep-homes-available)

p.57, paragraph 2, final sentence. We'd suggest avoiding imperative language outside of policies - this sentence is phrased to provide direction, but doesn't have weight outside of a policy.

p.60 Policy 1, Clause 2. The adopted Local Plan Key Centre boundary has been tested through an examination in public and has been found to be justified and 'sound'. Whilst, in principle, an alteration to the town centre boundary could be made by an NDP, it is incorrect for Policy 1 to say that the boundary is not justified.

Annex 2 of the NPPF (December 2023) provides the following definition of a town centre and main town centre uses:

Town centre: Area defined on the local authority's policies map, including the primary shopping area and areas predominantly occupied by main town centre uses within or adjacent to the primary shopping area. References to town centres or centres apply to city centres, town centres, district centres and local

centres but exclude small parades of shops of purely neighbourhood significance. Unless they are identified as centres in the development plan, existing out-of-centre developments, comprising or including main town centre uses, do not constitute town centres. (added emphasis)

Main town centre uses: *Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).*

Note, main town centre uses do not include C3 dwellings.

We're sympathetic to the case to protect the pharmacy. However, the pharmacy appears to be the only main town centre use within the proposed boundary extension. What's more, the pharmacy is detached from the existing town centre boundary by a number of properties in residential use and is around 80 metres from the nearest main town centre use. Grevel House, although listed, is in residential use.

The recent Cotswold District Local Plan Regulation 18 consultation included a proposal to alter the Chipping Campden Key Centre boundary in the same general area that the NDP seeks to change the boundary (see map below). This was to incorporate Lloyds Bank and the whole of the Lygon Arms building. However, we note that planning permission was granted on 6th December 2023 to convert and extend the former Lloyds Bank building to create five dwellings (ref: 23/02678/FUL). This now adds to the number of residential properties between the core of main town centre uses and the pharmacy.



The pharmacy is classified as social and community infrastructure, as defined by Policy 2 below. It is also classified as social and community infrastructure in accordance with Local Plan Policy INF2. It therefore already has some policy protection from changes of use to alternative uses, which is the reason for extending town centre boundary.

In summary, we do not consider the proposed extension to the town centre boundary to be consistent with the NPPF definition of a town centre. The town centre boundary must reflect the extent of the town centre that is predominantly occupied by main town centre uses. However, the proposed boundary includes a high proportion of residential uses.

p.63 Policy 1, Clause 3. We understand the ambition, but we wonder how the test in the clause would be interpreted. How does allowing visitor accommodation damage 'vibrancy'? Visitor accommodation could easily be argued to be more vibrant than residential!

We wonder whether a workable alternative might be along the lines of policies seeking to prevent overconcentration of Houses of Multiple Occupation (HMOs). There are quite a few examples, principally from university towns - Cirencester NDP has presented a policy at a recent Regulation 14 consultation you might wish to consider. On a point of detail, visitor accommodation, in the form of hotels, is considered already as a town centre use

As observed at p.59, the planning regime currently does not currently recognise short term lets as a use class, so a rather narrow reading of 'visitor accommodation' may need to be taken. It is difficult to draft policy to take account of changes yet to come, but it may be

worth expanding on the reference here either in the policy or supporting text to be clear that short term lets should be read into the definition if they are recognised as a new use class – see DLUHC press release 19 Feb 2024 - <https://www.gov.uk/government/news/short-term-lets-rules-to-protect-communities-and-keep-homes-available>.

Comment noted, Government update did not progress.

p.63 Policy 1, clause 4. What does 'to alleviate congestion' add to the policy? It is unclear from the current wording whether this applies to the school site and 'elsewhere', or to 'elsewhere' only. We suggestion deletion of this wording - congestion and parking capacity are two disparate issues – and providing parking may well attract traffic movement and increase, not decrease congestion.

Yet to be resolved

p.65 Table 6. The removal or installation of defibrillators isn't generally going to require a planning determination, so planning policy will rarely be an effective tool to retain these facilities. We note that the emerging Local Plan policy SD4 (3) as drafted looks to introduce a requirement on major developments to install defibrillators.

Elsewhere in the table, a number of shops are identified, and a private spa facility. The nature of the commercial offer at these locations could change substantially without requiring development consent – the table can exist at a statement of current fact, but please be aware the policy will not prevent loss of these facilities where development consent is not required.

Comment noted see page 64 "some infrastructure..."

Policy 2: Social and community infrastructure.

p.67 We support the identification of assets that could be considered under INF2. However, a number of the assets would not require development consent for the community benefit to be lost/changed. Commercial properties with a current use considered to be of community value could easily change to another commercial use - dentist, post office, Co-op, optician. It may be helpful to reflect this fully in supporting text, to manage community expectations.

Partially amended in line with comments – last paragraph p64

Please explain how this list is pertinent to EC8. – unsure this has been addressed

p.69 Policy 2: Social and community Infrastructure, clause 2. What are the criteria for suitability? We already recognise this as a legitimate land use, so how does this affect any decisions? Perhaps consider - proximity to the town - to enable active travel - parking and road access, to improve access, tranquillity, retention of tree cover.

Partially amended in line with comments

p.70 Building with Nature is a benchmark for green infrastructure rather than biodiversity net gain and therefore its use will not necessarily assist in delivering BNG.

It should also be noted that there is now a national GI framework prepared by Natural England, with its own design guidance.

<https://designatedsites.naturalengland.org.uk/GreenInfrastructure/downloads/Design%20Guide%20-%20Green%20Infrastructure%20Framework.pdf>

p67, para 6 Add in the presumed missing word 'little' to the last sentence. 'There is **little** that the planning system can do when the occupants of commercial premises vacate'

Policy 3: Design of the built and natural environment.

Comments on the Design Code at the end of this document

p.73 The intention is sound, but the wording is unclear when this requirement actually applies - we would suggest 'Planning Proposals requiring D&A...' or similar.

Building with Nature is a great initiative, but it is a commercial product and therefore should not be the only alternative is deciding whether GI is well-designed. Suggest change in wording to -

'Planning...and should be designed in accordance with Natural England's Green Infrastructure Planning and Design Guide and the Building with Nature standards or equivalent.'

Natural England GI framework is free to use – missing reference to Natural England

Policy 4: Non-designated Heritage Assets.

p.74 The text refers to features and also assets – normally features are part of an asset. While there is no reason why some of these smaller objects such as post boxes cannot be defined as assets (designated or non-designated), it is more problematic when you get down to those small features that form part of a wider building or asset, such as a boot scraper as these have no planning control.

It is somewhat confusing that the NDP sets out a list of criteria for NDHAs, but also refers to the criteria in the Local Plan. it would provide more consistency and robustness if the NDP simply used the Local Plan criteria.

p.76 CDC welcomes the inclusion of an NDHA policy – it is a great way to celebrate local assets, and to seek to give them appropriate recognition in any planning determinations. However we note a lot of the features singled out are fixtures on buildings which have heritage listing already, and thus cannot be NDHAs. This means that those features /fittings are already protected by the listing - important fixtures and fittings will require LBC for their removal – as the plan recognises at p74 p.56. This is already a higher degree of protection that an NDHA policy can confer.

In addition, some modern assets have been included such as the Millennium sign and the Cotswold Way marker. Although obviously of great community importance they cannot really be considered as a NDHA.

We can't see how the Plan can directly offer more protection to already listed assets, beyond their existing statutory listing, and the design guide which should help protect the wider setting, but the evidence base, cataloguing the sundials and boot scrapers could sit in the Plan to highlight these unusual features, telling the unique story of Chipping Campden, and raising awareness amongst owners and the general public that they are listed and thus protected. On that point, we commend the clear and visually appealing information shared at Appendix 6. We encourage you to provide a location map for these assets/features. This will enable all parties and particularly the LPA to be sure that these NDHAs are fully taken into account in the planning process.

If they are features of non-listed buildings (and therefore not covered by the LBC regime), the removal of some of these features e.g. a bootscraper, would not be development and therefore their removal would not form part of the planning process. It may be appropriate to put those building forward as NDHAs and identify those features specifically – it would go to the justification of their inclusion as NDHAs, and explain the particular features most worthy of preservation where possible.

Reference to this suggestion could be made clearer

It would be useful to make an addition to the text that states that additional NDHAs may be identified in the future, for example through the planning process.

Could still be added to at the end of paragraph 74.

Policy 5: Environment and Biodiversity Net Gain

p.72 This will have to be updated to reflect the implementation of the Environment Act and also ongoing work on the Gloucestershire Local Nature recovery Strategy.

The text states that 10% BNG applies to all development – this is not strictly correct, there are several exemptions, for example householder applications.

The text is slightly confusing in places – is the NDP providing information that is being fed into the countywide LNRS or putting forward a nature recovery strategy of its own? There are already nature recovery plans for the Cotswolds National Landscape and the Cotswold Water Park, so there is no reason why a parish level nature recovery plan is not appropriate, noting that it should definitely feed into the county-wide work. We suggest it would be better not to call it a 'nature recovery strategy' as that may create confusion with the county level work. There is a lot of detail here, for example it may not be necessary to mention the national guidance particularly given its focus on local nature recovery strategies rather than local nature recovery per se. We suggest some changes to the text below:

~~The Environment Act also introduced Local Nature Recovery Strategies (LNRS). These National guidance on local nature recovery (LNR) was issued by DEFRA on 23 March 2023 and continues to be provided in advice notes and other materials. Local nature recovery strategies are a nationwide system of spatial strategies to help reverse the decline of biodiversity. There will be approximately 50 strategy areas covering the whole of England with no gaps or overlaps. Preparation of each strategy will be locally led by a 'responsible authority', in this case Gloucestershire County Council (GCC), as the "responsible authority" is preparing the Gloucestershire LNRS, and has commissioned the Gloucestershire Local Nature Partnership to assist with this work. –will be working with Gloucestershire Wildlife Trust (GWT) and the Gloucestershire Environmental Records Centre to deliver the LNR for Chipping Campden. As the responsible authority, GCC will be is required to work collaboratively with other local organisations including parish councils with input encouraged from across the public, private and voluntary sectors to establish shared proposals for what action should be taken and where.~~

~~In this case, the CCNDP is setting out a series of sites (fig 15), which are the optimum locations within the parish to deliver nature recovery, because either they~~

are already important for biodiversity in their own right, for their ecological connectivity function or because they have good potential to increase in biodiversity value or connectivity. These are based on data provided by the Gloucestershire Wildlife Trust. (appendix 7) a local land use strategy for inclusion in the wider LNR strategy when that is prepared. Section 106 of the Environment Act 2021 requires that all local nature recovery strategies must contain a statement of biodiversity priorities and local habitat map and lists what both must include. In this case, the LNR strategy has not been prepared and in anticipation, the Town Council has commissioned the Gloucestershire Wildlife Trust, to prepare maps of habitats and ecological data for local input into the preparation of the LNR, probably as part of the local habitat map for Gloucestershire. The Environment Act 2021 requires that all statements of biodiversity priorities set out: • a description of the strategy area and its biodiversity • a description of the opportunities for recovering or enhancing biodiversity in the strategy areas • the priorities for recovering or enhancing biodiversity • proposals as to potential measures relating to those priorities The strategy area The strategy area is the neighbourhood area. Appendix 7 provides detailed habitat maps describing the local baseline which is being put forward for inclusion may be included in the LNR strategy for Gloucestershire LNRS. The maps show areas of particular importance for biodiversity, either because of their existing designations, they are locally important or have potential for improvement. Figure 15 shows potential areas of importance.

Partially amended in line with comments

p.80 paragraph 4. It is not clear if the map at fig 16 is simply showing all the areas that are included within the relevant appendix. Might be helpful to distinguish between areas that are of existing ecological value and those that would be suitable for enhancement.

May need further work to clarify this information

p.75 paragraph 1. It is not clear why there is a reference to planning permission - It is not necessary at the application stage (or at determination of the application) for the applicant to be completely clear where they will deliver their BNG –they can simply say that it will be delivered off site, although the LPA are encouraging applicants to provide as much information as possible.

BNG delivery will not be limited to the Gloucestershire Nature and Climate Fund. These paragraphs need re-working to make them clearer. Is the NDP the appropriate place to set out areas that the local community want to put forward for inclusion in the county wide LNRS? It is very valuable information but we wonder whether it should be in the NDP – given that it needs to be taken forward through other avenues.

We suggest re-wording:

Opportunities and priorities for recovering and enhancing biodiversity

Not only should the sites identified on figure 15 be included within the Gloucestershire LNRS but they also provide the most ecologically meaningful local locations for any off-site Biodiversity net gain that arises from development within the Parish to be located. DEFRA advice is that some changes in land use or management may require a separate consent before they can be undertaken, such as planning permission. Responsible authorities do not need the relevant consents to

~~be in place before including areas that could become of particular importance in their local habitat map. It is therefore appropriate and possible for the CCNDP to indicate where biodiversity net gain and habitat improvement could be directed to be finally determined at planning application stage, when the details of a specific proposal can be fully explored. DEFRA guidance states that the priorities identified by every local nature recovery strategy should reflect local circumstances, including the most important issues to local people and organisations. The CCNDP is therefore setting out local priorities to assist in the preparation of the wider LNR strategy. Figure 15 and the more detailed evidence in Appendix 2 and Appendix 7 shows that there are already existing habitats that could benefit from protection and improvement, marked 4-13. Table 7 indicates how biodiversity gain and habitat improvement could be achieved in each of the locations identified in fig 15. area. It is important to note that identification as a local nature recovery area on figure 15 does not preclude development. Existing land use policies will remain in place. The delivery of off-site BNG at these nature recovery areas could be via the Gloucestershire Nature and Climate Fund or other mechanisms. However there are also other sources of funding that could support nature recovery, for example What will change however is that the identified sites will be put forward as local nature recovery strategy options. It is expected that as the Environment Act legislation evolves, funding for nature improvements will become available through a range of sources such as the Gloucestershire Nature and Climate Fund1, agri-environment schemes or through the delivery of biodiversity net gain through the planning system. The latter would also include off-site biodiversity net gain contributions, probably managed through the Nature and Climate Fund.~~

Partially amended in line with comments

p.84 Policy 5: Environment and Biodiversity Net Gain

Noting the extensive comment on the Reasoned Justification, please be assured that we welcome the ambition in this policy - and the intention to wrestle with this issue. We haven't had other NDPs in our area pick this up this extent, so we're keen to help you make the most of this.

The first section of the policy as drafted is not a land use policy, as it is simply stating that these areas will be put forward as suggestions for inclusion in the county wide LNRS – and indeed they may or may not be included in the final LNRS, dependent on a range of evidence.

It is also important to bear in mind that even where areas are identified in the LNRS they are not necessarily where off-site BNG will happen. They are likely to affect the BNG scores by providing strategic significance multipliers but that does not force the BNG to those locations. Strategic significance multipliers for Gloucestershire are set out in our BNG guidance - <https://www.cotswold.gov.uk/planning-and-building/wildlife-and-biodiversity/biodiversity-net-gain-bng/>

That said, we aren't convinced that it is within the legal purview of a neighbourhood plan to designate land as a Local Nature Recovery area - these areas will be designated in the Local Nature Recovery Strategy – if that is what they end up being called in the strategy, which isn't a district level planning function. That document should take account of parish

views and the evidence base, so we think the evidence and intention can absolutely be presented in the NDP, but we aren't convinced that this clause can go forward as policy.

'Proposals that are required to provide biodiversity net gain must demonstrate that those requirements have been fully addressed as follows:

(a) Contact Cotswold District Council to determine whether work has been done towards the preparation of the Gloucestershire Local Nature Recovery Strategy regarding the proposal site, its relationship with the Gloucestershire Local Nature Recovery map, and seek advice on how best to deliver local nature recovery and biodiversity net gain within that context.'

This is not policy, so much as explanatory text. A Local Planning Authority could not refuse an application because the applicant had not done this. We'd suggest you move this to the supporting text.

(b) Where biodiversity net gain cannot be delivered on site, applicants must work with Cotswold District Council to identify ways that off-site biodiversity net gain can be delivered in Chipping Campden Parish.

We suggest a rewording, to make sure this is a test to be satisfied at the time of planning determination – something along the lines of "Where BNG cannot be delivered on the development site, off-site BNG should be delivered within Chipping Campden Parish unless sufficient justification is provided to show that this is not possible." There is a risk that this policy will not meet the Government guidance, as the BNG metric already includes a factor for proximity to the development site. This point notwithstanding, we believe it is an appropriate policy issue for an NDP, and we have tried to emphasise this issue in the Local Plan Reg. 18 consultation biodiversity policies -

Off-site BNG should be delivered in locations that contribute to the Gloucestershire Nature Recovery Network and that are as close to the development site as possible.

(c) Where off-site biodiversity gain is proposed, this should be focused on the nature recovery areas shown in Figure 15 or the Gloucestershire Local Nature Recovery Map.

Perhaps absorb this into the policy above –

"Where BNG cannot be delivered on the development site, off-site BNG should be delivered within the Chipping Campden Local Nature Recovery Areas as the first option or elsewhere within Chipping Campden Parish or in locations that contribute to the Gloucestershire Local Nature Recovery Strategy unless sufficient justification is provided to show that this is not possible.

(d) Expert ecological advice should accompany planning applications to demonstrate how long-term biodiversity net gains on-site or off-site will be delivered with enduring benefits, and long-term management where necessary.

That is not required as it forms part of the legal requirements for BNG anyway

(e) Only where off-site biodiversity improvements can be proven impossible to deliver within the parish can off-site and out-of-parish biodiversity improvements be considered.

That is implicit – BNG is a requirement, and the policy already stresses the preference for 'on-site' or local and is also covered in the clauses above.

(f) Planning proposals must demonstrate that landowners of sites where biodiversity net gain is proposed agree to the proposals and will cooperate in their delivery.

That is not required, you cannot deliver off-site BNG unless the land-owner is partner to that process so this clause is not necessary.

clause (f) removed – partially amended in line with comments

Policy 6: Local Green Spaces

p.85 and Appendix 8.

This is a relatively large number of sites, which collectively may be considered to almost encircle the town and constrain growth - which may undermine the process.

We note that a number of sites are already subject to constraints making development challenging - for example development on the Bratches Allotments, Bowling Green and Cricket pitch would require alternative provision to be made, so amenity is protected already, as you have noted. You may wish to consider and articulate the extent to which these sites are demonstrably special, beyond this amenity value.

Sites 19 and 20, individually and together are large tracts of land on the periphery of the town, without extensive formal access rights, and subdivided by a number of field boundaries. NPPF para 106 c) requires that an LGS is 'local in character and is not an extensive tract of land'. Typically, sites which are primarily agricultural in nature require a strong justification to meet the NPPF criteria. Please see Planning Practice Guidance, Paragraph: 011 Reference ID: 37-011-20140306 and Paragraph: 015 Reference ID: 37-015-20140306, <https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space>.

We would strongly encourage you to ensure site owners are aware of these proposal – the onus is upon the qualifying body to consult with the site owners – and examiners have upon occasion sought confirmation of this. Paragraph: 019 Reference ID: 37-019-20140306 <https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space>

There are a few sites where ownership appears uncertain - predominantly these are the smaller verges and informal public open space. We do not object to their inclusion but note that given their important function within the townscape/conservation areas, there's little risk to these sites from development.

partially amended in line with comments

Appendix 2

These maps are not easy to read even when zoomed. The maps are dated 2017 - information of this type is being constantly updated so it is highly likely that if this map was requested again that it would be different. Noting the challenge of trying to reference data that is regular updated, one option might be to acknowledge that the map is likely to be out of date / become outdated, and to be clear that the data will change over time.

Chipping Campden Design Guide

p.5. We note that the Design Guide references MHCLG as the sponsoring Government department. MHCLG was rebranded as DLUHC, the Department for Levelling Up, Homes and Communities in 2021.

p.9. The national design guide is no longer a draft.

We would expect to see reference to the National GI Framework prepared by Natural England, with its own design guidance.

<https://designatedsites.naturalengland.org.uk/GreenInfrastructure/downloads/Design%20Guide%20-%20Green%20Infrastructure%20Framework.pdf>

We encourage you to add web references for all this documents to make access easier.

p.13. As per our comment on the main NDP document, please change AONB references to National Landscape.

The design guide seems very focused on architectural design, rather than landscape/ecological etc design.

p.43. p 45 We would encourage some consideration of decarbonisation as well as energy efficiency.

partially amended in line with comments – no reference to decarbonisation

p.40. p 42 We wonder if the photos are all meant to be exemplars, or simply examples of particular design features – e.g. the stone mullion windows in the photo on this page are not great. There are other examples where the images do not show necessarily show great design but are illustrative. Perhaps there is some scope to reflect this nuance in the picture referencing, to encourage developers to respond to context and the direction of the design guide, and improve on current practice, rather than replicate the acceptable.

Clarity may still be required

Contact:

Neighbourhood Planning

Cotswold District Council
Council Offices
Trinity Road

Cirencester
Gloucestershire
GL7 1PX

Rep #31 - Historic England



Dear Neighbourhood Planning team

Thank you for your Regulation 16 consultation on the submitted version of the Chipping Campden Neighbourhood Plan.

I can confirm that there are no issues associated with the Plan upon which we wish to comment.

Our advice relating to the Regulation 14 consultation exercise is attached for information.

Kind regards



| Historic Places Adviser



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[REDACTED]

Dear [REDACTED]

I write following up your exchange of communication with my colleague [REDACTED] below.

The recently ended consultation on the draft Neighbourhood Plan for Chipping Campden came to our attention a short while ago and so we sought to enquire whether this was an exercise which we needed to be formally involved in.

Having looked at the Plan's website we note that although not specifically referred to as a Regulation 14 consultation, reference is made to the pre-submission stage which the Plan has reached, and that comments made will be used to revise the Plan as appropriate prior to its submission to Cotswold District Council for Examination.

It is for the relevant community to exercise discretion in determining whether the interests of Historic England are likely to be affected by the policies and proposals which the Plan aspires to, and to decide whether or not to consult us accordingly. At the same time, our experience has shown that Examiners can sometimes be a little twitchy on learning that the statutory agencies have not been consulted at the formal consultation stages in a Plan's preparation, and have been known to ask for us to be consulted during the Examination process, obviously causing undesirable extra work and delay.

In the case of the Chipping Campden Plan, we did have sight of an advanced draft of the Plan as part of the District Council's consultation on the associated SEA Screening in February this year. At that time we identified that there were no headline issues which we wished to flag up, nor were there likely to be matters upon which we would be likely to wish to comment on assuming the Plan went forward essentially unchanged.

Having now considered the version of the Plan which formed the basis of the recent consultation I can confirm that there are indeed no significant issues associated with the Plan upon which we wish to comment. We note its limited schedule of policies but that these are ably developed and supported by a detailed understanding of the town and its context, and especially its unique historic character.

We are therefore pleased to observe the complimentary production of the Design Code referred to in Policy 3 on Design and again in Appendix 5. This should help enormously in ensuring that new development does conserve and enhance the town's unique townscape, the desirability of which is highlighted on p38 which sets out issues which earlier community consultation identified.

That feedback also identified the need for a Community Design Statement. It is not clear whether the Design Code recently produced is meant to address this need entirely. P38 also refers to the importance of the townscape not being spoiled by inappropriate uses which can affect the area's attraction to tourists and damage the local economy. There may therefore be an opportunity to

consider whether there are other local issues, such as public realm design and management for example, which could also benefit from locally informed and tailored policy or guidance.

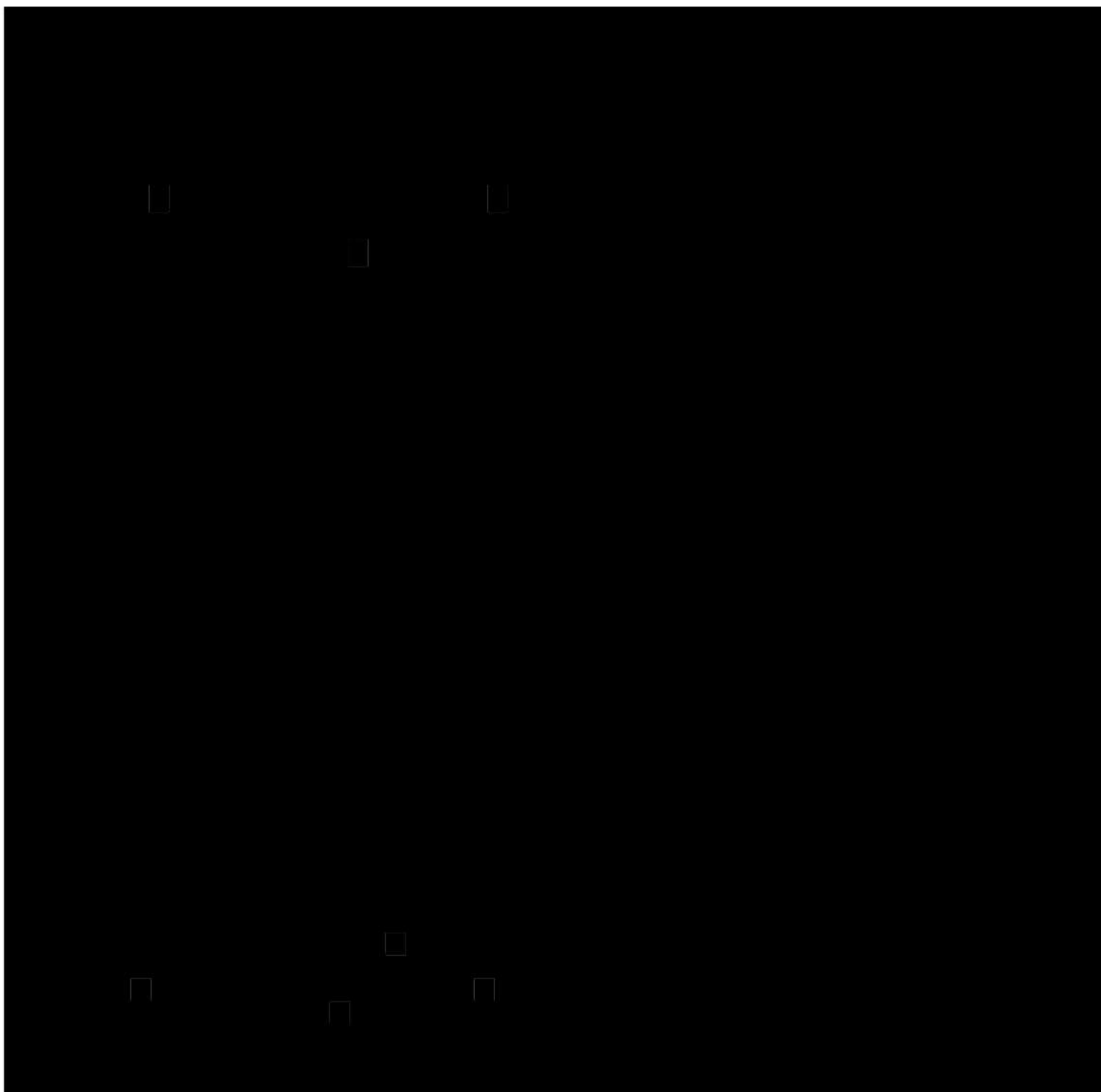
In the context of the Neighbourhood Plan this of course is a matter entirely for the discretion of your community.

Otherwise, we would only want to congratulate your community on its Plan, and wish it well in the subsequent stages to getting it made.

Kind regards



| Historic Places Adviser



23 July 2024

Neighbourhood Planning,
Cotswold District Council,
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By email: Neighbourhood.Planning@cotswold.gov.uk

Dear Sirs

**Chipping Campden Neighbourhood Plan – Regulation 16 consultation
Representation on behalf of landowner interests at Springhill Industrial Estate**

1. This representation is made by SF Planning Limited in response to the Chipping Campden Neighbourhood Plan Regulation 16 pre-examination consultation 2025 (the NDP document), on behalf of the owners of 4.95ha land at Springhill Industrial estate, Chipping Campden, GL56 9TP as shown edged approximately in red on the plan below. Their site falls within the neighbourhood plan area.



Figure 1 - Red line showing our client's site edged approximately in red for identification purposes only.

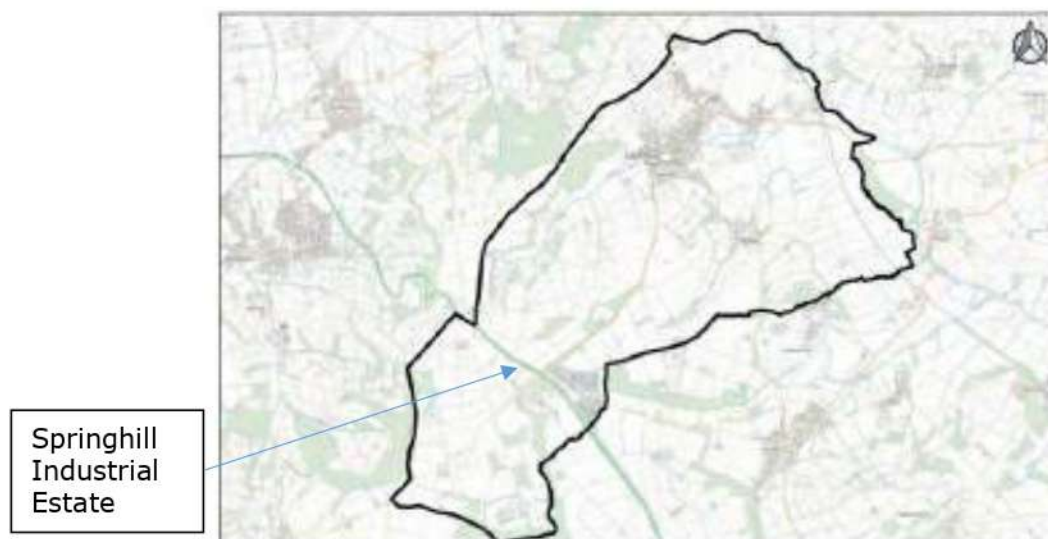


Figure 2 - Extract from NDP document showing Neighbourhood area.

2. As submitted previously, our client's site is an established industrial estate with a long history of employment use and development, comprising various industrial buildings and businesses, including an oil distribution depot, storage tank manufacture and repair facility, and a waste oil storage depot. The site also includes a worked-out quarry that has been repurposed for industrial use.
3. The industrial estate benefits from existing infrastructure, including access roads and utilities including fast broadband, which support the current businesses operating on the site.
4. As the Town Council are aware, our client has submitted representations in respect of both the Cotswold District Council (CDC) local plan review and the Regulation 14 Chipping Campden neighbourhood plan. Both of these representations set out the importance of the site as established employment land which merits safeguarding under the local plan. Both representations are attached to this letter.
5. The Town Council response to our representation on the regulation 14 draft NDP is shown below (figure 3)

Springhill Industrial Estate	
The representation is promoting a site for employment development. This site is being promoted through the local plan review. The representation makes the case that the CCNDP should address and protect employment sites outside the town centre.	In relation to employment, the CCNDP focuses on the town centre not as allocations (which is proposed here) but to manage existing development over specific matters (retention of town centre uses, extent of the town centre boundary, short term holiday lets, support for additional parking) and not to allocate or protect land for employment use. Though this is possible to do in an CCNDP, consultation did not identify this as a priority.
The representation also mentions in para. 12 that the client owns some of the land identified for local nature recovery. Safety issues on the quarry face may make nature recovery difficult.	This is a long-term policy and the use of the land may change over the longer term. The policy is not directive or restrictive and so the identification of this location's potential in the CCNDP will be retained.

Figure 3 – extract from page 50 of the Neighbourhood Plan Consultation Report, February 2025.

Employment land safeguarding

6. Notwithstanding the comments from the Town Council, we remain firmly of the view that the NDP is an excellent opportunity to recognise the importance of the Springhill Industrial Estate as a local employment site and part of the local economy and safeguard it for future growth. Also, its location outside the town centre ensures that employment traffic does not exacerbate the existing town centre traffic situation.
7. Clearly, the NDP cannot be all things to all people, however the need to enhance the local economy at a challenging time for employers needs to be recognised and planning has a role to play in this. The NDP should therefore allocate or dedicate the land for employment uses. Its contribution to the local economy, and its potential for future employment growth make it a valuable asset that should be safeguarded.
8. We are unsure as to which consultation identified the safeguarding of employment land as low priority but note that our previous consultation submission highlighted it as being a high priority due to the need for the neighbourhood plan to support economic development and we continue to believe that it should be a high priority.
9. Just because the current draft of the local plan does not allocate sites (including employment sites), this does not mean that it should not. This is a prime opportunity to correct what we consider to be a significant oversight. Locality outline the benefits of site allocations at page 31 of their document neighbourhood planning: how to assess and allocate sites for development:

"A site allocation can be used to shape development in a neighbourhood area and is also an important tool to communicate expectations and aspirations. For a community, it can be a way of understanding and expressing the shared vision and objectives of the residents and businesses living and working in a neighbourhood area. It can be a way of communicating the levels of development and supporting infrastructure that would be accepted in an area and the design principles that should be followed. For a landowner or developer, it provides certainty over what is expected from development, including the design and community facilities that are sought through new development."

10. There is a wealth of research confirming that young people leaving school are most likely to want to live in areas where they have access to employment opportunities and are more likely to stay in an area where they grew up if they have access to the services, jobs and facilities which meet their needs. It is the Town Council's vision for Chipping Campden to realise the potential of young people (page 13 of the NDP) however the NDP itself runs contrary to this, having only a very narrow focus only on the town centre of chipping Campden and not

on employment sites within other parts of the parish or indeed on other services and facilities (for example in Broad Campden). Without furthering the reach of the NDP, this has the potential to be a significant lost opportunity to boost the local economy across the whole parish and not just in the town of Chipping Campden.

11. The NDP suggests that it is a plan for all residents but then fails to give due recognition to locations outside of Chipping Campden town centre which is, in our view, a significant oversight.
12. The NDP recognises the importance of the BRI site and to the business park to the east of the town, stating on page 26 of the NDP that *"the impact of the BRI and the opportunities for growth and innovation on the Business Park, allow for the local economy to grow, thrive and innovate. Much of Chipping Campden's economy is tied to the success of these enterprises."* The same could be said for our client's site, forming an important part of the local economy so it is alarming that the NDP does not do more to protect or even recognise local employment sites in the parish.
13. There is a question as to whether the NDP is consistent with local and national policies. For example, the CDC local plan at paragraph 9.2.7 states;

"The aim, therefore, is to maintain and enhance the role of established employment sites, where they are well located, through the development of further employment uses and the prevention of changes to other uses".
14. Nationally, the NPPF contains the following policies in relation to neighbourhood planning, which the Town Council should comply with when preparing the NDP:

NPPF paragraph no.	Text
PARAGRAPH 13.	The application of the presumption has implications for the way communities engage in neighbourhood planning. Neighbourhood plans should support the delivery of strategic policies contained in local plans or spatial development strategies; and should shape and direct development that is outside of these strategic policies.
PARAGRAPH 30.	Neighbourhood planning gives communities the power to develop a shared vision for their area. Neighbourhood plans can shape, direct and help to deliver sustainable development, by influencing local planning decisions as part of the statutory development plan. Neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies
PARAGRAPH 85.	Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic

	growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future
PARAGRAPH 88.	Planning policies and decisions should enable: a) the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed, new buildings; b) the development and diversification of agricultural and other land-based rural businesses; c) sustainable rural tourism and leisure developments which respect the character of the countryside; and d) the retention and development of accessible local services and community facilities, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship.

15. In summary, we remain of the view that the retention and potential expansion of the Springhill Industrial Estate still aligns with the principles of sustainable development by providing employment opportunities for the area and supporting the longer-term vitality and viability of the local economy.
16. As mentioned previously (although our client has not heard anything to date), our client is happy to have discussions with the Town Council about the parameters of the site and the potential for growth and how it could support the local economy as the NDP progresses. This would assist in the policy wording.

Local Nature Recovery Sites

17. We have previously submitted a response to the Town Council which confirms that one of the Local Nature Recovery (LNR) sites is within or adjacent to our client's land (a woodland area along the A44). Our client shares the goal of retaining the woodland however, this land secures the quarry face close to the A44 so is needed primarily for safety reasons. This restricts the ability to further enhance the woodland and facilitate nature recovery and therefore our client considers that it would not be appropriate to designate this section as a LNR site.
18. The NPPF at paragraph 196 requires planning policies and decisions to ensure that;

"a site is suitable for its proposed use taking account of ground conditions and any risks arising from land instability and contamination. This includes risks arising from natural hazards or former activities such as mining, and any proposals for mitigation including land remediation (as well as potential impacts on the natural environment arising from that remediation)"

19. The NDP evidence base does not include an assessment of the impact of the LNR policy on land stability. This is a risk which persists from the historic use, not the use going forward as the consultation response would suggest. In order for the plan to be consistent with local and national policy; the Town Council should commission a survey and assess the overall impact prior to submitting the NDP for examination.
20. An assessment should also look at the impact of the LNR on operations at this already established industrial site in order to meet the basic requirements.
21. Please contact me should you find it helpful to discuss the information included in this submission.

Yours faithfully


SF Planning Ltd.